PART 70 OPERATING PERMIT
OFFICE OF AIR MANAGEMENT

Carpenter Company
195 County Road 15 South
Elkhart, Indiana 46515

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T039-6059-00086	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary source that produces soft block foam, chemical blending for customers, and cushion blocks.

Responsible Official:	Tommy Stinson
Source Address:	195 Elkhart, IN 46515
Mailing Address:	P.O. Box 2386, Elkhart, IN 46515
SIC Code:	3086, 2899
County Location:	Elkhart
County Status:	Attainment for all criteria pollutants
Source Status:	Part 70 Permit Program Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(a) One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.

(b) One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.

(c) Three (3) adhesive stations with three (3) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

(d) One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.

(e) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:
1. grinding operation,
2. pneumatic conveyor system,
3. storage bins,
4. foam dry mixer,
5. wet mixer,
6. molding unit, and
7. storage operations.

(f) Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.

(g) One (1) fixed roof above ground storage tank identified as MLD-1, for storage of Isocyanate, has the diameter, height and annual throughput as: 10 feet, 14 feet and 131,549 gallons per year respectively.

(h) One (1) fixed roof above ground storage tank identified as MLD-2, for storage of Polyols-soft, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 323,546 gallons per year respectively.

(i) One (1) fixed roof above ground storage tank identified as MLD-3, for storage of Polyols-hard, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 310,408 gallons per year respectively.

(j) The following tanks are grouped into four general categories - Primary pour, Rebond pour, Molding, and Chemical Blending:

Facility Description [326 IAC 2-7-5(15)] : Primary Pour tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	85	ABA	352	100,000
P8	4,890	8	15	NA	EMPTY	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0
P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	NA	0
P20	12,000	10.5	18	NA	EMPTY	NA	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000

P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	8	3000	POLYOL	0	600,000
P26A	3,000	8	8	3500	POLYOL	0	100,000

Notes: * Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)
** Closed system

Facility Description [326 IAC 2-7-5(15)] : Chemical Blending - Tanks

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 +
C17	11,500	8	30.5	575	POLYOL	0	C18
C18	11,500	8	30.5	575	POLYOL	0	100,000
C19	28,500	12	34	360	MDI	0	150,000
C20	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C21	11,500	8	30.5	360	MDI	0	20,000
C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	30,000
C24	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	600,000
C26	11,500	8	30.5	5000	POLYOL	0	25,000
C27	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C28	11,500	8	30.5	360	MDI	0	30,000

C29	11,500	8	30.5	538	BPOLYOL	0	10,000
C30	11,500	8	30.5	538	BPOLYOL	0	50,000
C31	11,500	8	30.5	538	BPOLYOL	0	10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C36	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C37	28,500	12	34	360	MDI	0	150,000
C38**	12,000	9	41	120.8	ABA	0	10,000

Notes: * Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)
** Closed system

Facility Description [326 IAC 2-7-5(15)] : Rebond tanks EU-4

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	6,500	8	17.3	174	ISO-PP	0.01	500,000***
R2	4,000	8	10	174	ISO-PP	0.01	500,000***

Notes: * Emission control device, CV, N2, or CA
** Closed System
ISO-PP - Isocyanate Prepolymer
*** R1 and R2 cascade from one tank to the next for a TOTAL throughput of 500,000 gallons. These tanks are vented through only one (1) vent.

Facility Description [326 IAC 2-7-5(15)] : Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	8,200	10	14	195	B POLY	0.01	131,549
MLD2	8,200	10	14	5000	BPOLY	0	323,546
MLD3	8,200	10	14	5000	ISO	0	310,408

Notes: * Emission control device, CV, N2, or CA
** Closed System

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million Btu/hr.

One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.

(b) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22).
(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM, within a reasonable time, any information that IDEM, OAM, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM, copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM, along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision;

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM, may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission units and associated emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM, upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM, may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM, by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM, shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM, has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM, has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM, determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM, may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM, and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM, takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM, any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM, fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM, in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]
Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]
Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.
[326 IAC 2-7-6(6)]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch, within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM, shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 PSD Minor Source Status [326 IAC 2-2] [40 CFR 52.21]

(a) The total source potential to emit of VOC are less than 250 tons per year. Therefore the requirements of 326 IAC 2-2 (Prevention of Significant Deterioration) and 40 CFR 52.21 will not apply.

(b) Any change or modification which may increase potential emissions to 250 tons per twelve (12) consecutive month period, from the equipment covered in this permit, shall require a PSD permit pursuant to 326 IAC 2-2, before such change may occur.

C.2 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.3 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3 (a)(2)(A) and (B) are not federally enforceable.

C.5 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.6 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

C.12 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee shall prepare written emergency reduction plans (ERPs) consistent with safe operating procedures.

(b) These ERPs shall be submitted for approval to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ninety (90) days after the date of issuance of this permit.

The ERP does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) If the ERP is disapproved by IDEM, OAM,), the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(d) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(e) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(f) Upon direct notification by IDEM, OAM, that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-7-5(12)] [40 CFR 68.215]

If a regulated substance, subject to 40 CFR 68, is present in a process in more than the threshold quantity, 40 CFR 68 is an applicable requirement and the Permittee shall:

(a) Submit:

(1) A compliance schedule for meeting the requirements of 40 CFR 68 by the date provided in 40 CFR 68.10(a); or

(2) As a part of the compliance certification submitted under 326 IAC 2-7-6(5), a certification statement that the source is in compliance with all the requirements of 40 CFR 68, including the registration and submission of a Risk Management Plan (RMP); and

(3) A verification to IDEM, OAM, that a RMP or a revised plan was prepared and submitted as required by 40 CFR 68.

(b) Provide annual certification to IDEM, OAM, that the Risk Management Plan is being properly implemented.

All documents submitted pursuant to this condition shall include the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.15 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5][326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.17 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

C.18 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.19 General Record Keeping Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three

(3) years and available upon the request of an IDEM, OAM, representative. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;

(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

(b) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(d) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(e) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(f) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.21 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:
One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

(a) The amount of methylene chloride (MC), with a maximum of 1.5 % of propylene oxide, shall be limited to less than 1600 tons per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the foam pouring line being greater than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which may increase the potential VOC emissions to 25 tons per year from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing

D.1.3 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent month or twelve (12) month period.

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Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

No monitoring requirements are applicable to the foam pouring line.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
(2) The cleanup solvent usage for each month;
(3) The total VOC usage for each month; and

(4) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.

Compliance Determination Requirements

D.2.1 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
Three (3) adhesive stations with three (3) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for each adhesive station shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

If testing is required by IDEM, compliance with the PM limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
One (1) boiler, identified as EU-03, fueled by natural gas, rated at 12.55 MMBtu per hour, exhausting to stack identified as V6.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 12.55 MMBtu per hour heat input boiler shall be limited to 0.5 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Compliance Determination Requirement

D.4.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)][326 IAC 2-7-19]

D.4.3 Natural Gas Certification

The natural gas boiler EU-3 certification form will document compliance with condition D.4.1 when the boiler EU-3 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C- General Reporting Requirements of this permit.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. grinding operation,
2. pneumatic conveyor system,
3. storage bins,
4. foam dry mixer,
5. wet mixer,
6. molding unit, and
7. storage operations.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for the bonded foam line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.6 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] :

Two (2) closed mold polyurethane foam turnstile production operation, identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting to stack V-34.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.6.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

D.6.2 BACT condition

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements),

(a) The high volume low pressure (HVLP) spray application shall be used all the time when two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU -5.2 are in operation.

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

b) The weight percentage solid content and maximum usage of mold release at the two (2) closed polyurethane turnstile production units identified as EU-5.1 and EU-5.2 with a combined maximum capacity of 400 unit per hour shall be no less than 7% and no more than 0.003 gallons per unit. This shall be equivalent or less than 32.50 tons per 12 month period from each turnstile production unit identified as EU-5.1 and EU-5.2.

Any change or modification which may increase the potential VOC emissions from the two (2) closed mold polyurethane turnstile production operation identified as EU-5.1 and EU-5.2 in this BACT analysis shall be approved by the Office of Air Management (OAM).

Compliance Determination Requirements

D.6.3 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.6.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.6.4 Record Keeping Requirement

A log of information necessary to document compliance with operation permit condition No.6.2 (b) shall be maintained. These records shall be kept for at least the past 36 months period and made available upon request to the Office of Air Management (OAM).

SECTION D.7 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] : Primary Pour tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	85	ABA	352	100,000
P8	4,890	8	15	NA	EMPTY	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0

P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	NA	0
P20	12,000	10.5	18	NA	EMPTY	NA	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000
P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	8	3000	POLYOL	0	600,000
P26A	3,000	8	8	3500	POLYOL	0	100,000

Notes: * Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)
** Closed system

Facility Description [326 IAC 2-7-5(15)] : Chemical Blending - Tanks

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 +
C17	11,500	8	30.5	575	POLYOL	0	C18
C18	11,500	8	30.5	575	POLYOL	0	100,000
C19	28,500	12	34	360	MDI	0	150,000
C20	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C21	11,500	8	30.5	360	MDI	0	20,000

C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	30,000
C24	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	600,000
C26	11,500	8	30.5	5000	POLYOL	0	25,000
C27	11,500	8	30.5	NA	EMPTY	NA	Future polyol
C28	11,500	8	30.5	360	MDI	0	30,000
C29	11,500	8	30.5	538	BPOLYOL	0	10,000
C30	11,500	8	30.5	538	BPOLYOL	0	50,000
C31	11,500	8	30.5	538	BPOLYOL	0	10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C36	11,500	8	30.5	538	BPOLYOL	0	Future polyol
C37	28,500	12	34	360	MDI	0	150,000
C38**	12,000	9	41	120.8	ABA	0	10,000

Notes: * Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)
** Closed system

Facility Description [326 IAC 2-7-5(15)] : Rebond tanks EU-4

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	6,500	8	17.3	174	ISO-PP	0.01	500,000***
R2	4,000	8	10	174	ISO-PP	0.01	500,000***

Notes: * Emission control device, CV, N2, or CA
** Closed System
ISO-PP - Isocyanate Prepolymer
*** R1 and R2 cascade from one tank to the next for a TOTAL throughput of 500,000 gallons. These tanks are vented through only one (1) vent.

Facility Description [326 IAC 2-7-5(15)] : Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	8,200	10	14	195	B POLY	0.01	131,549
MLD2	8,200	10	14	5000	BPOLY	0	323,546
MLD3	8,200	10	14	5000	ISO	0	310,408

Notes: * Emission control device, CV, N2, or CA
** Closed System

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.7.1 Record keeping Requirement

Pursuant to 60.116b (a) and (b) the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the vessel for the life of the source.

SECTION D.8 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant:

One (1) boiler, fueled by natural gas, rated at 8.36 MMBtu per hour, exhausting to a stack.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.8.1 Particulate Matter (PM)

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 8.36 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Compliance Determination Requirement

D.8.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.8.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

SECTION D.9 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] Insignificant:

Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.9.1 326 IAC 8-3-2 Cold Cleaner operations

That pursuant to 326 IAC 8-3-2 (Cold Cleaner Operations), the owner or operator shall:

1) equip the cleaner with a cover;
2) equip the cleaner with a facility for draining cleaned parts;
3) close the degreaser cover whenever parts are not being handled in the cleaner;
4) drain cleaned parts for at least fifteen (15) seconds or until dripping ceases;

5) provide a permanent, conspicuous label summarizing the operation requirements;
6) store waste solvent only in covered containers and not dispose of waste solvent or transfer it to another party, in such a matter that greater than twenty percent (20%) of the waste solvent (by weight) can evaporate into the atmosphere.

SECTION D.10 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) flexible [EU-01-slab stock, EU-04 - rebond, and EU-05 - molded] polyurethane foam manufacturing operation.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.10.1 General Provisions Relating to HAPs [326 IAC 20-1-1][40 CFR Part 63, Subpart A]

The provisions of 40 CFR Part 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR Part 63, Subpart III.

D.10.2 Flexible Polyurethane Foam Production NESHAP [40 CFR Part 63, Subpart III]

This facility is subject to 40 CFR Part 63, Subpart III and shall be in compliance with all applicable provisions of this subpart no later than October 8, 2001. The Flexible Polyurethane Foam Production NESHAP consists of the following sections:

63.1290 Applicability
63.1291 Compliance Schedule
63.1292 Definitions
63.1293 Standards for slabstock flexible polyurethane foam production
63.1294 Standards for slabstock flexible polyurethane foam production–diisocyanate emissions
63.1295 Standards for slabstock flexible polyurethane foam production–HAP auxiliary blowing agent (ABA) storage vessels
63.1296 Standards for slabstock flexible polyurethane foam production–HAP ABA equipment leaks
63.1297 Standards for slabstock flexible polyurethane foam production–HAP ABA emissions from the production line
63.1298 Standards for slabstock flexible polyurethane foam production–HAP emissions from equipment cleaning
63.1299 Standards for slabstock flexible polyurethane foam production–sourcewide emission limitation
63.1300 Standards for molded flexible polyurethane foam production
63.1301 Standards for rebond foam production
63.1302 Applicability of Subpart A requirements
63.1303 Monitoring requirements
63.1304 Testing requirements
63.1305 Alternative means of emission limitation
63.1306 Reporting requirements
63.1307 Recordkeeping requirements

63.1308 Compliance demonstrations
63.1309 Delegation of authority
Appendix to Subpart III– Tables

A copy of this rule is attached.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, IN 46515
Mailing Address: P.O. Box 2386, Elkhart, IN 46515
Part 70 Permit No.: 039-6059-00086

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

☐ Annual Compliance Certification Letter

☐ Test Result (specify) _____

☐ Report (specify) _____

☐ Notification (specify) _____

☐ Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, IN 46515
Mailing Address: P.O. Box 2386, Elkhart, IN 46515
Part 70 Permit No.: 039-6059-00086

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
☐ 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
☐ 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, IN 46515
Mailing Address: P.O. Box 2386, Elkhart, IN Source Name:
Part 70 Permit No.: T039-6059-00086
Facility: Foam Pouring Line, identified as EU-01A/B
Parameter: Methylene Chloride usage
Limit: Less than or equal to 1600 tons per 12 month consecutive period

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Methylene Chloride usage	Previous 11 Months Methylene Chloride usage	12 Month Total
Month 1			
Month 2			
Month 3			

☐ No deviation occurred in this quarter.

☐ Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT

NATURAL GAS FIRED BOILER CERTIFICATION

Source Name: Carpenter Co.
Source Address: 195 County Road 15 South, Elkhart, IN 46515
Mailing Address: P.O. Box 2386, Elkhart, IN Source Name:
Part 70 Permit No.: T039-6059-00086

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Report period
Beginning: _____
Ending: _____

Boiler Affected	Alternate Fuel	Days burning alternate fuel From	To

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit

Source Background and Description

Source Name:	**Carpenter Company**
Source Location:	**195 County Road 15 South**
County:	**Elkhart, IN 46515**
SIC Code:	**3086, 2899**
Operation Permit No.:	**T039-6059-00086**
Permit Reviewer:	**Peggy Zukas**

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Carpenter Company relating to the production of soft block foam, chemical blending for customers, and cushion blocks.

Permitted Emission Units and Pollution Control Equipment

(a) One (1) coating booth, identified as EU-02A, coating plastic, type of application method is HVLP and exhausting to stack identified as V32.

(b) One (1) coating booth, identified as EU-02B, coating polyurethane foam, type of application method is HVLP.

(c) One (1) boiler, identified as EU-03, fueled by natural gas, rated at thirteen 12.55MMBtu per hour, exhausting to stack identified as V6.

(d) Two (2) closed mold polyurethane foam turnstile production operation identified as EU-5.1 and EU-5.2, with total of two (2) robotic high volume low pressure (HVLP) spray application, with maximum capacity of 37.0 lbs. release agent per hour, 808.30 pounds of Isocyanate and 1,550 pounds of polyols per hour, exhausting at vents identified as V-34 and V-35.

(e) One (1) fixed roof above ground storage tank identified as MLD-1, for storage of Isocyanate, has the diameter, height and annual throughput as: 10 feet, 14 feet and 131,549 gallons per year respectively.

(f) One (1) fixed roof above ground storage tank identified as MLD-2, for storage of Polyols-soft, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 323,546 gallons per year respectively.

(g) One (1) fixed roof above ground storage tank identified as MLD-3, for storage of Polyols-hard, has the diameter, height and annual throughput as: 10 feet, 14 feet, and 310,408 gallons per year respectively.

(h)

Fixed roof cone storage tanks with nitrogen blankets	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Containing	Annual throughput (gallons)
1, 4, 5, 6, 7, 8, 9, 10, 12, 14, 15, 16, 17, 18, 20, 23, 24, 25, and 27	11,500	8	30.5	polyols	11,900
2	28,500	12	34	polyols	20,300
3	11,500	8	30.5	fyrol CEF	20,292
11, 26	28,500	12	34	polyols	11,900
19	28,500	12	34	MDI based isocyanates	72,500
21	11,500	8	30.5	polyols	72,500
22, 28	11,500	8	30.5	MDI based isocyanates	72,500
29, 30, 31, 32, 33, 34, 35, 36	11,500	8	30.5	Richfill 101-4125 or related derivative	21,900
37	28,500	12	34	Richfill 101-5084 or related derivative	21,900

There are no unpermitted facilities operating at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Space heaters, process heaters, or boilers using the following fuels:

(A) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour.

(B) Fuel oil-fired combustion sources with heat input equal to or less than two million (2,000,000) Btu per hour and firing fuel containing less than five-tenths (0.5) percent sulfur by weight.

(2) A petroleum fuel, other than gasoline, dispensing facility having a storage capacity less than or equal to 10,500 gallons, and dispensing less than or equal to 230,000 gallons per month.

(3) The following VOC and HAP storage containers:

Vessels storing lubricating oils, hydraulic oils, machining oils, and machining fluids.

(4) Refractory storage not requiring air pollution control equipment.

(5) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6.

(6) Closed loop heating and cooling systems.

(7) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.

(8) Noncontact cooling tower systems with either of the following:

Forced and induced draft cooling tower system not regulated under a NESHAP.

(9) Paved and unpaved roads and parking lots with public access.

(10) Equipment used to collect any material that might be released during a malfunction, process upset, or spill cleanup, including catch tanks, temporary liquid separators, tanks, and fluid handling equipment.

(11) Blowdown for any of the following: sight glass; boiler; compressors; pumps; and cooling tower.

(12) Other emergency equipment as follows:

(A) Stationary fire pumps.

(13) Grinding and machining operations controlled with fabric filters, scrubbers, mist collectors, wet collectors and electrostatic precipitators with a design grain loading of less than or equal to 0.03 grains per actual cubic foot and a gas flow rate less than or equal to 4000 actual cubic feet per minute, including the following: deburring; buffing; polishing; abrasive blasting; pneumatic conveying; and woodworking operations.

(14) Purge double block and bleed valves.

(15) Mold release agents using low volatile products (vapor pressure less than or equal to 2 kilopascals measured at 38 degrees C).

(16) A laboratory as defined in 326 IAC 2-7(20)(c).

Other categories with emissions below insignificant thresholds

(17) TDI Storage tanks (QTY= 6) FPR foam pouring lie (PLT1-4) faom pouring line (PLT1-4) -0.00105 lbs/hr or 0.0252 lbs/day or 0.0045 TPY of VOC

(18) Paint booth - 0.55 lbs/hr or 13.2 lbs/day or 2.41 TPY VOC

(19) Blending operation with tanks (T1-49) - 0.034 lbs/hr or 0.816 lbs/day or 0.15 TPY VOC

(20) Flame laminators - 1.02 lbs/hr or 24.48 lbs/day or 4.47 TPY PM

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP 039-9044, March 4, 1998,
(2) CP 039-5335, withdrawn October 10, 1996,
(3) R 039-4850, issued on November 2, 1995,
(4) A 039-4622, issued on June 30, 1995,
(5) R 039-4383, issued on May 25, 1995,
(6) R 039-2347, issued on May 3, 1992,
(7) PC (20) 1832, issued on January 19, 1990, withdrawn on October 28, 1992

(8) Exemption, no permit number was provided, issued on February 6, 1989,
(9) Exemption, no permit number was provided, issued on December 5, 1986,

All conditions from previous approvals were incorporated into this Part 70 permit.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on June 4, 1996.

A notice of completeness letter was mailed to the source on May 20, 1997.

Emission Calculations

See Appendix A of this document for detailed emissions calculations on page 1 of 4 through 4of 4.

Calculating the limits for natural gas fired boilers rated at 8.37 MMBtu/hr and 12.55 MMBtu/hr.

326 IAC 6-2-4 Particulate emission limitations

$Pt= 1.09/Q^{0.26}$

(a) Emission limit for natural gas boiler rated at 8.37 MMBut/hr.

$Pt = 1.09 / (8.37)^{0.26}$ =0.6 lb/MMBtu

(b) Emission limit for natural gas boiler rated at 12.55MMBt/hr.

8.37 MMBtu/hr + 12.55 MMBtu/hr = 20.92 MMBtu/hr

$Pt = 1.09 / (20.92)^{0.26}$ = 0.5 lb/MMBtu

(c) Compliance determination:

Allowable emissions	vs	Potential	Boiler rated at 8.36 MMBtu/hr
5.0 lbs/hr	>	0.09 lb/hr	This boiler is in compliance with 326 IAC 6-2-4.
Allowable emissions	vs	Potential	Boiler rated at 12.55 MMBtu/hr
6.3 lbs/hr	>	1.4 lb/hr	This boiler is in compliance with 326 IAC 6-2-4.

Total Potential Emissions

Permits	Date of issuance	PM	PM10	SO2	VOC	CO	NOx
039-9044	March 4, 1998	0.32	0.32	0.0	161	0.0	0.0
R39-4850	November 2, 1995 this registration	2.78	2.78	0.0	15.70	0.0	0.0
A 039-4622	June 30, 1995 Amendment to Registration 039-4383	14.27	11.34	0.0	2.76	0.0	0.0
R039-2347	March 3, 1992	0.0	0.0	0.0	1.8	0.0	11.4
Exemption	December 5, 1986						
Exemption	February 6, 1989						
CP 039-5335 withdrawn	Withdrawn on October 10, 1996	--	--	--	--	--	--
PC (20) 1832 withdrawn	Withdrawn on October 28, 1992	--	--	--	--	--	--
Total Potential emissions ton/yr		17.4	14.4	0.0	181.3	0.0	11.4
VOC for the original AOS will be subtracted out					- 46.12		
					135.18		
VOC for the new AOS will be add					+6.78		
total		17.4	14.4	0.0	142.0	0.0	11.4

On May 12, 1997 OAM received a letter from Bruce Carter Associates, L.L.C, amending the Title V application. The alternative operating scenario (AOS) labeled as EU-02a has been modified and implemented into production. The original application method of rolling a solvent based adhesive at 350.89 lbs/hr has been altered. The application now consists of a spray application, with HVLP guns, that applies a Methylene Chloride based adhesive, 2414X, to foam at a maximum rate of 119.123 lbs/hr.

Thus, the potential emissions have been lowered as indicated above.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as “emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility.” Potential emissions are from the 1996 OAM emission data.

Pollutant	Potential Emissions (tons/year)
PM	17.4
PM-10	14.0
SO_2	0.0
VOC	142
CO	0.0
NO_x	11.4

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Methyl Chloroform	greater than 25
Methylene Chloride	greater than 25
All other HAPs	less than 10
TOTAL	greater than 10

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the information provided by Bruce Carter & Associates letter dated May 23, 1996.

Pollutant	Actual Emissions (tons/year)
PM	0.0
PM-10	0.0
SO_2	0.0
VOC	4.78
CO	0.0
NO_x	0.0
HAP	greater than 25

Limited Potential to Emit

The table below summarizes the total potential to emit, reflecting all limits, of the significant emission units.

	Limited Potential to Emit (tons/year)						
Process/facility	PM	PM-10	SO_2	VOC	CO	NO_x	HAPs
EU-5.1 and EU5.2	326 IAC 6-4						

County Attainment Status

The source is located in Elkhart County.

Pollutant	Status
TSP	attainment
PM-10	attainment
SO_2	attainment
NO_x	attainment
Ozone	attainment
CO	attainment
Lead	attainment

Volatile organic compounds (VOC) and oxides of nitrogen (Nox) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Elkhart County has been designated as attainment or unclassifiable for ozone.

Federal Rule Applicability

Tanks 1,3,4,5,6,7,8,9,10,12,14,15,16,17,18,20,21,22,23,24,25,27,28,29,30,31,32,33,34,35,36 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.11.6b (a) and (b), Subpart (Kb)). All have a capacity of greater than 40 cubic meters, but less than 75 cubic meters.

Tanks 2, 11, 19, 26 and 37 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d). Because, the tanks have a design capacity greater than 19,813 gallons, but less than 39,890 gallons, the maximum true vapor pressures are less than 15 Kpa.

40 CFR Part 60, Subpart Kb, (Standards of Performance for Volatile Organic Liquid Storage Vessels)
The volatile organic liquid storage tanks identified as MLD-1, MLD-2 and MLD-3 are not applicable to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb), because each tank has a volume of 31.20 cubic meters which is less than the applicability level of 40 cubic meters.

The Carpenter Company is subject to the Nation Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR Part 63, Subpart (III)).

State Rule Applicability - Entire Source

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by(April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of forty percent (40%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2 (Surface Coating Emissions Limitations)

The material being coated with adhesive is polyurethane foam, which is a plastic. There are no specific limitations for coating plastics. Therefore, coating booth EU-02A is not subject to 326 IAC 8-2.

326 IAC 8-2 (General provisions relating to VOC rules: general reduction requirements for new facilities)

The maximum potential emissions for VOC are 15.7 tons per year. Therefore, coating booth EU-02A is not subject to 326 IAC 8-2.

326 IAC 8-2 (Surface Coating Emissions Limitations)

The material being coated with adhesive is polyurethane foam, which is a plastic. Therefore, are no specific limitations for coating plastics. Therefore, coating booth EU-02B is not subject to 326 IAC 8-2.

326 IAC 8-2 (General provisions relating to VOC rules: general reduction requirements for new facilities)

The maximum potential emissions for VOC are 15.7 tons per year. Therefore, coating booth EU-02B is not subject to 326 IAC 8-1-6 does not apply.

The PM from the coating booth EU-02A, EU-02B, EU-5.1 and EU-5.2 shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and P = process weight rate in tons per hour

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 8.36 MMBtu per hour heat input boiler shall be limited to 0.6 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Pursuant to 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) the PM emissions from the 12.55 MMBtu per hour heat input boiler, identified as EU-05, shall be limited to 0.5 pounds per MMBtu heat input.

This limitation is based on the following equation: $Pt = 1.09/Q^{0.26}$

Where: Pt = Pounds of particulate matter emitted per million Btu heat input.
Q = Total source maximum operating capacity rating in million Btu per hour heat input.

Pursuant to 326 IAC 8-1-6 (New Facilities, General Reduction Requirements),

(b) The high volume low pressure (HVLP) spray application shall be used all the time when two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU - 5.2 are in operation.

High volume low pressure (HVLP) spray means technology used to apply coating to a substrate by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per square inch gauge (psig) air pressure measured dynamically at the center of the air cap and at the air horns of the spray system.

(c) The volatile organic compounds (VOC) delivered to the mold release compound shall not exceed 2.71 tons per month from each of the two (2) closed mold polyurethane turnstile production units identified as EU-5.1 and EU-5.2 . This is equivalent to 7% solid content by weight in the mold release compound, based on the 0.003 gallon of the mold release use per unit.

Any change or modification in which may increase the potential VOC emissions from the two (2) closed mold polyurethane turnstile production operation identified as EU-5.1 and EU-5.2 in this BACT analysis shall be approved by the Office of Air Management (OAM).

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The coating booth, identified as EU-02A, and coating booth, identified as EU-02B has applicable compliance monitoring conditions as specified below:

(a) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response

Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because ensures compliance with 326 IAC 6-3 (process Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

Conclusion

The operation of manufacturing soft block foam shall be subject to the conditions of the attached proposed **Part 70 Permit No. T039-6059-00086.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	**Carpenter Co.**
Source Location:	**195 County Road 15 South, Elkhart, IN 46515**
County:	**Elkhart**
SIC Code:	**3086, 2899, 3086**
Operation Permit No.:	**T039-6059-00086**
Permit Reviewer:	**Peggy Zukas**

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, in Elkhart, Indiana, stating that Carpenter Company had applied for a Part 70 Operating Permit to operate a polyurethane foam process, chemicals and chemical preparations, N.E.C. and rebonded foam manufacturing. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 22, 1998, Carpenter Company submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

The foam pouring operation has not added any new ingredient categories since the original registration date of February 9, 1983. We have eliminated the use of Freon11 as a blowing agent in this operation per the Montreal Protocol. All other components are still in use. The main ingredient of concern, propylene oxide (PO), is an acid inhibitor added to urethane grade methylene chloride (MC) by the manufacturer of this chemical. It is our understanding that this inhibitor has been used in MC since the time the product was introduced into our industry as an auxiliary blowing agent (ABA). The PO concentration in MC is approximately 1.2- 1.5 weight percent per MSDS information. The PO will chemically react with any acid that might be formed in the MC thereby reducing the emissions of PO to less than 100% of the amount entering the process. Assuming 100% of the maximum amount of the PO in the MC is emitted, Carpenter calculates actual emissions of PO to be between six and eight tons per year. This calculation is simply the total MC usage for the year as determined by plant records multiplied by the percentage of PO in the raw material. Therefore, Carpenter Company requests a limit of less than 25 tons per year from Emission Unit 01 to avoid the requirements of BACT.

The space available to pour new foam into the slab room, Emission Unit 01B, is a limiting factor controlling the emission from the foam pour line, Emissions Unit 01A. A new pour of foam blocks is produced over approximately 5 hours of actual running time and placed in the slab room where they require an additional 12-14 hours of cure time due to the exothermic heat associated with the chemical reactions before further processing can occur. When the slab room has reached capacity, no additional slabs can be poured due to lack of storage space. The pour line is capable of producing more foam on a 24 hour basis than the slab room can store; but it is limited to the amount it can actually produce by the space available. This effectively limits production to 24 hour cycles. Operating cycles are as follows:

5 hours pouring + 14 hours curing + 5 hours moving stock = 24 hours
Calculations for maximum potential to emit (PTE) assume a maximum methylene chloride feed rate of 3600 lbs/hour and therefore a maximum feed rate of PO for 24 hours/day, 365 days/year. Assuming 100% of the PO is emitted, the PTE for this process would be 236.5 tons/yr per the following calculation:

8760 hrs/hr x 3600 lbs/hr MC x 0.015 (%PO)/2000 lbs/ton = 236.5 tons/yr PTE

Carpenter Company operates the foam pour line approximately 5 hours per day, 5 days per week, 50 weeks per year. Current production at 5 hrs/day, 5 days/wk, 50 wk/yr at the maximum feed rate again assuming 100% of the PO is emitted, gives emissions of 33.75 tons/yr. of PO per the following calculation:

5hr x 5 days x 50 weeks x 3600 lbs/hr MC x 0.015 (%PO)/2000 lbs/ton = 33.75 tons PO

Not all foams produced by Carpenter use MC as a ABA and those products that do use MC in their respective formulations do not all use MC at the maximum flow rate of 3600 lbs/hr. Firm foams use no MC while very soft foams use the maximum MC rate. The future usage rates of MC in foam have been addressed in the recently published NESHAP for our industry. Our actual usage in 1997 was 441 tons of MC. Again, assuming 100% of the PO in the MC was emitted results in 6.6 tons/ of PO emissions for 1997 per the following calculation:

441 tons MC x 0.015 (%PO in MC) = 6.6 tons PO in 1997

Response to comment 1:
OAM will put in a condition to limit the VOC content to less than 25 tons/yr in order to limit out of BACT.

~~D.9.1 (now identified as D.1.1) Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~The amount of VOC usage delivered to the applicator of for the foam pouring line identified as EU-01A/B shall be limited to less than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.~~

The amount of methylene chloride (MC), with a maximum of 1.5 % of propylene oxide, shall be limited to less than 1600 tons per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the foam pouring line being greater than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

The following facility has been added to Section A and included in Section D. The OAM has reorganized the permit in sequential numerical order for ease of locating per Carpenter's request.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The amount of methylene chloride (MC), with a maximum of 1.5 % of propylene oxide, shall be limited
to less than 1600 tons per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the foam pouring line being greater than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which may increase the potential VOC emissions to 25 tons per year from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing

D.1.3 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

No monitoring requirements are applicable to the foam pouring line.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
(2) A log of the dates of use;
(3) The cleanup solvent usage for each month;
(4) The total VOC usage for each month; and
(5) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The following page is a quarterly report form prepared by IDEM:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: **Carpenter Co.**
Source Address: **195 County Road 15 South, Elkhart, IN 46515**
Mailing Address: **P.O. Box 2386, Elkhart, IN Source Name:**
Part 70 Permit No.: **T039-6059-00086**
Facility: **Foam Pouring Line, identified as EU-01A/B**
Parameter: **Methylene Chloride usage**
Limit: **Less than or equal to 1600 tons per 12 month consecutive period**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Methylene Chloride usage	Previous 11 Months Methylene Chloride usage	12 Month Total
Month 1			
Month 2			
Month 3			

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Comment 2:

The draft permit has omitted the emission unit one (EU-01A&B), the foam slab pour line and slab cure room as detailed in our May 1996 permit application. Please revise the draft to include this emission unit. Carpenter also requests they be allowed to review and comment, if necessary, on this revision/addition to the permit. These modifications will also need to be made within the respective Technical Support Document (TSD) emission unit descriptions.

Response to Comment 2:

Please refer to comment 1 for the changes.

Comment 3:

Emission unit two (EU-02A), needs to be changed to read One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32. Contrary to BCA's May2, 1997 letter, Carpenter has not begun an alternate operating scenario (AOS) with a HVLP gun. In addition Carpenter is now using a water based adhesive that should classify this facility as exempt. See Attachment A for revised facility emission spreadsheet calculations, PI-19 form, and flow diagram. These modifications will also need to be made within the respective TSD emission unit descriptions.

Response to Comment 3:

Section A.2, Section D.2 and the TSD shall be revised to reflect the following change:

(a) ~~One (1) coating booth, identified as EU-02A, coating plastic, type of application method is HVLP and exhausting to stack identified as V32.~~ **One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.**

Comment 4:

Emission unit two (EU-02B), needs to be changed to read Three adhesive stations within three loop slitting process lines, identified as EU-02B, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions. The actual "operating scenario" applies Richadh 2414X adhesive and cleanup solvent, as it is written within Part 70 permit application. In addition, Carpenter requires that two additional alternative operating scenarios (AOS) be assigned to EU-02B. EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive, and thus have non-regulated emissions. EU-02B: AOS No. 2 will utilize UPACO 3694, an acetone and heptane based adhesive, that has already been issued registration permit CP-039-4850 in November 2, 1995. See attachment B for applicable AOS No. 1 and AOS No.2 facility flow diagrams, IDEM Registration issuance, and MSDS' for the above referenced modified EU-02 facility operating scenarios. These modifications will also need to be made within the respective TSD comments, and the emission unit descriptions in Section D.2.

Response to comment 4:

Section A.2(b), Section D.2 (now identified as D.3) and the TSD shall be revised because Carpenter has requested two additional alternative operating scenarios (AOS) be assigned to EU-02B. EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive, and thus have non-regulated emissions. EU-02B: AOS No. 2 will utilize UPACO 3694, an acetone and heptane based adhesive, that has already been issued registration permit CP-039-4850 in November 2, 1995. The following has been amended:

(b) ~~One (1) coating booth, identified as EU-02B, coating polyurethane foam, type of application method is HVLP.~~ **Three (3) adhesive stations with three (3) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive**, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

Comment 5:

The description of the 12.55 MMBtu boiler (EU-03) includes the word “thirteen” for some unknown reason, we suspect it was a typographical error that should be removed. In addition, the error is repeated anywhere that boiler is referenced within the permit.

Response to comment 5:

Section A.2, Section D.3 (now identified as D.4) and the TSD shall be revised as follows:

One (1) boiler, identified as EU-03, fueled by natural gas, rated at ~~thirteen~~ 12.55 MMBtu per hour, exhausting to stack identified as V6.

Comment 6:

The draft permit has omitted the emission unit for (EU-04), the bonded foam line as detailed in our May 1996 permit application. Please revise the draft to include this emission unit. Carpenter also requests they be allowed to review and comment, if necessary, on this revision/addition to the permit. These modifications will also need to be made within the respective TSD emission unit descriptions.

Response to comment 6:

The OAM shall revise Section A.2 , and the TSD and add a new Section D.10 (now identified as D.5) to the permit.

(l) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. **grinding operation,**
2. **pneumatic conveyor system,**
3. ~~**six (6) bins,**~~ **storage bins,**
4. **foam dry mixer,**
5. **wet mixer,**
6. **molding unit, and**
7. **storage operations.**

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. **grinding operation,**
2. **pneumatic conveyor system,**
3. ~~**six (6) bins,**~~ **storage bins,**
4. **foam dry mixer,**
5. **wet mixer,**
6. **molding unit, and**
7. **storage operations.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for the bonded foam line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

The following calculations were taken from the registration CP 039-2347-00086:

(1) VOC from molding process: 0.35 lb/hr
Emissions: 0.35 lb/hr x 24 hr/day = 8.4 lb/day

8.4 lb/day x 365 day/yr/ 2000lbs/ton = 1.5 ton/yr

(2) PM from grinding operation- escapes from a pneumatic collection system into factory space, everything else is product.

Emissions = 1.0 lb/hr = 24 lb/day = 4.4 tons/yr.

Comment 7:

The following modifications need to be made for the bulk chemical above ground storage tank (AST) facilities to accurately detail the present facility/operating conditions. These modifications should be made in A.2 (h) and the Technical Support Document (TSD) emission unit description (h) Carpenter's ASTs can be grouped into four general categories and will have the following revised identification numbering system:

A. Primary pour, P1 through P26A,
B. Rebond pour, R1 and R2,
C. Molding, MLD1 through MLD3, and
D. Chemical Blending, C1 through C39

Carpenter ASTs are shelters inside the production building. Therefore the ASTs and the raw material are not subject to the diurnal temperature fluctuations normally encountered when ASTs are exposed to outside elements. This protection from the elements allows raw materials to maintain relatively uniform temperatures, therefore emissions from the respective chemicals are effectively constant. Most stored products have low vapor pressure and should result in little or no breathing losses. In addition for those products which have vapor pressure that indicate losses, Carpenter utilizes a variety of emission controls on HAP containing ASTs that include closed systems (CS), conservation vents (CV), nitrogen Blankets (N2), and stack/vent carbon absorption bed filters (CA). See Attachment C AST Summary Table for specific AST emission calculation parameters, that reflect the permits source summary.

Response to comment 7:

In Section A.2(h) and D. 5 (now identified as D.7) the OAM will revise the tanks information as follows:

The rule 326 IAC 12, (40 CFR 60.116b(d), Subpart (Kb)) has been deleted in section D.5.2 (now D.7.2) because the vapor pressure of the applicable tanks (C2, C11, C19, C25 and C37) is zero (0).

(h) The following tanks are ~~part of the chemical blending and packaging process:~~ **grouped into four general categories - Primary pour, Rebond pour, Molding, and Chemical Blending:**

Primary Pour tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	85	ABA	352	100,000
P8	4,890	8	15	NA	empty	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0
P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	na	0
P20	12,000	10.5	18	NA	EMPTY	na	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000
P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	18	3000	POLYOL	0	600,000
P26A	3,000	~~8~~	~~18~~ 8	3500	POLYOL	0	100,000

Notes: * Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)
**** Closed system**

Chemical Blending - Tanks

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	~~20.36~~ 132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 +
C17	11,500	8	30.5	575	POLYOL	0	C18
C18	11,500	8	30.5	575	POLYOL	0	100,000
C19	28,500	12	34	360	MDI	0	~~100,000~~ 150,000
C20	11,500	8	30.5	NA	EMPTY	NA	~~150,000~~ Future polyol
C21	11,500	8	30.5	360	MDI	0	~~Future polyol~~ 20,000
C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	~~20,000~~ 30,000
C24	11,500	8	30.5	NA	EMPTY	NA	~~30,000~~ Future Polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	~~Future POLYOL~~ 600,000
C26	11,500	8	30.5	5000	POLYOL	0	~~600,000~~ 25,000
C27	11,500	8	30.5	NA	EMPTY	NA	~~25,000~~ Future polyol
C28	11,500	8	30.5	360	MDI	0	~~Future POLYOL~~ 30,000
C29	11,500	8	30.5	538	BPOLYOL	0	~~30,000~~ 10,000
C30	11,500	8	30.5	538	BPOLYOL	0	~~10,000~~ 50,000
C31	11,500	8	30.5	538	BPOLYOL	0	~~50,000~~ 10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	~~10,000~~ 500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future POLYOL
C36	11,500	8	30.5	538	BPOLYOL	0	Future POLYOL

C37	**28,500**	**12**	**34**	**360**	**MDI**	**0**	**150,000**
C38**	**12,000**	**9**	**41**	**120.8**	**ABA**	**0**	**10,000**

Notes: * Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)
**** Closed system**

Rebond tanks EU-4

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	**6,500**	**8**	**17.3**	**174**	**ISO-PP**	**0.01**	~~**250,000**~~ **500,000**
R2	**4,000**	**8**	**10**	**174**	**ISO-PP**	**0.01**	~~**250,000**~~ **500,000**

Notes: * Emission control device, CV, N2, or CA
**** Closed System**
ISO-PP - Isocyanate Prepolymer
***** R1 and R2 cascade from one tank to the next for a TOTAL annual throughput of 500,000 gallons. These tanks are vented through only one (1) vent.**

Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	**8,200**	**10**	**14**	**195**	**B POLY**	**0.01**	**131,549**
MLD2	**8,200**	**10**	**14**	**5000**	**BPOLY**	**0**	**323,546**
MLD3	**8,200**	**10**	**14**	**5000**	**ISO**	**0**	**310,408**

Notes: * Emission control device, CV, N2, or CA
**** Closed System**

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~D.5.1 Permit Requirements~~

~~Any change or modification which may increase the potential VOC emissions to 25 tons more from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.~~

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.2 (now 7.1) Record keeping Requirement

Pursuant to 60.116b (a) and (b) the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the vessel for the life of the source. ~~Pursuant to 60.116b (d), for tanks numbered 2, 11, 19, 26 and 37, the owner or operator of each storage vessel storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure value~~

The following has been deleted from A.2(h) and Section D.5 (now D.7)facility operation conditions:

~~Facility Description [326 IAC 2-7-5(15)] Fixed roof cone storage tanks with nitrogen blankets~~	~~Storage Capacity (gallons)~~	~~Diameter (feet)~~	~~Height (feet)~~	~~Containing~~	~~Annual throughput (gallons)~~
~~1, 4, 5, 6, 7, 8, 9, 10, 12, 14, 15, 16, 17, 18, 20, 23, 24, 25, and 27~~	~~11,500~~	~~8~~	~~30.5~~	~~polyols~~	~~11,900~~
~~2~~	~~28,500~~	~~12~~	~~34~~	~~polyols~~	~~20,300~~
~~3~~	~~11,500~~	~~8~~	~~30.5~~	~~fyrol CEF~~	~~20,292~~
~~11, 26~~	~~28,500~~	~~12~~	~~34~~	~~polyols~~	~~11,900~~
~~19~~	~~28,500~~	~~12~~	~~34~~	~~MDI based isocyanates~~	~~72,500~~
~~21~~	~~11,500~~	~~8~~	~~30.5~~	~~polyols~~	~~72,500~~
~~22, 28~~	~~11,500~~	~~8~~	~~30.5~~	~~MDI based isocyanates~~	~~72,500~~
~~29, 30, 31, 32, 33, 34, 35, 36~~	~~11,500~~	~~8~~	~~30.5~~	~~Richfill 101-4125 or related derivative~~	~~21,900~~
~~37~~	~~28,500~~	~~12~~	~~34~~	~~Richfill 101-5084 or related derivative~~	~~21,900~~

Comment 8:

B.27, Credible Evidence, states impart that “other credible evidence may be used to demonstrate compliance or non compliance.” In other conditions, the permit states specific methods that may be used to determine compliance or noncompliance with applicable requirements of the permit. To allow for use of “other credible evidence” is vague and subject to interpretation as to meaning. IDEM’s authority to include such a vague provision in a part 70 permit is in question. Carpenter does not believe this condition should be made a binding part of a Part 70 permit. Carpenter requests that this condition be removed in its entirety.

Response to comment 8:

The IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana’s statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

Comment 9:

C.17(b), Emission Statement, states in part that "the annual emission statement covers the 12 consecutive month time period starting December 1 and ending November 30". Carpenter usage records and inventory process are generated from the normal calender time period of January 1 and ending December 31. Creating a new inventory methodology just for chemical usage would be burdensome. Carpenter therefore, requests their emission statement cover a normal calender time period. In addition, a submittal mailing address was omitted from the draft permit.

Response to comment 9:

The OAM will make the following change to C.17 by adding the mailing address:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Since Carpenter is subject to 326 IAC 2-6-1(a) and 326 IAC 2-6-2(13)(A), the annual emission statement shall cover the twelve (12) consecutive month time period starting December 1 and ending November 30. The condition shall remain the same.

Comment 10:

D.1.1 Particulate Matter, does not apply for EU-02A since the operation is rollcoating and does not emit PM. Likewise, D.1.3 and D.1.4 do not apply. Carpenter requests removal of Condition D.1.1, D.1.3 and D.1.4 from draft permit.

Response to comment 10:

Conditions D.1.1, D.1.3 and D.1.4 (now D.2.1, D.2.2 and D.2.4) shall be removed. Since the lamination process is not using HVLP but instead roll coating, the following condition shall be deleted or modified:

~~D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and~~
~~P = process weight rate in tons per hour~~

~~D.1.2 Volatile Organic Compounds (VOC)~~

~~Any change or modification which may increase the potential VOC emissions to 25 tons per year from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.~~

Compliance Determination Requirements

D.1.3 (now 2.1) Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

If testing is required by IDEM, compliance ~~with the PM limit specified in Condition D.1.1~~ shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.1.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stackV32 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Comment 11:

D.2.3, Testing Requirements, and D.2.4, Monitoring, do not apply to EU-02B since this facility's operation does not utilize a surface coating booth or stack. PM emissions go to general ventilation, without a control device. Carpenter requests removal of Conditions D.2.3 and D.2.4 from the permit.

Response to comment 11:
(D.2.3 is now identified as D.3.2)

The OAM is aware that the process does not require testing requirements. This is evident in the first sentence of the condition which states, "The Permittee is not required to test this facility by this permit." Since OAM is not requiring a stack test and the condition states this fact, the condition shall remain the same.

The monitoring condition shall be removed since the unit does not have a control device and the actual emissions do not exceed 25 tons per year.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the adhesive station stack while one or more of the stations are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Comment 12:

D.4.2 (b) BACT condition, states in part that the weight % solids of the mold release " . . . Shall be no more than 7%...". It should read, **. . . shall be not less than 7% . . . .**

Response to comment 12:
(D.4.2 is now identified D.6.2)

The following condition shall be revised as follows:

(b) The weight percentage solid content and maximum usage of mold release at the two (2) closed polyurethane turnstile production units identified as EU-5.1 and EU-5.2 with a combined maximum capacity of 400 unit per hour shall be no ~~more~~ **less** than 7% and **no more than** 0.003 gallons per unit. This ~~is~~ **shall be** equivalent **or less than** 32.50 tons per 12 month period from each turnstile production unit identified as EU-5.1 and EU-5.2.

Comment 13:

D.4.4 Record Keeping Requirement, references "compliance with Operation Condition 5.2 (b)". Although the number system will change due to additions, it should have referenced Operation Condition 4.2 (b). In addition several misspelled words were discovered in this section, which need to be corrected.

Response to comment 13:

Condition D.4.4 (now D.6.4) will be revised as follows:

D.4.4 (now D.6.4) Record Keeping Requirement

A log of information necessary to document compliance with operation permit condition No.~~5~~ **6**.2 (b) shall be maintained. These records shall be kept for at least the past 36 months period and made available upon request to the Office of Air Management (OAM).

The following will show corrections concerning the TSD but no changes will be made in the TSD.

Comment 14:

Due to the above referenced requested modifications, subsequent TSD information will also require modifications to reflect the new permit conditions. In addition, the following modifications need to be made to reflect current site/source conditions.

Insignificant Activities

Comment 14(a):

(4) Refractory storage and (20) Flame lamination should be removed since they are no longer used.

Response to comment 14(a):

The following equipment have been removed from the company.

~~(4) Refractory storage not requiring air pollution control equipment.~~
~~(20) Flame laminators - 1.02 lbs/hr or 24.48 lbs/day or 4.47 TPY PM~~

Comment 14 (b):

Item (17) should show eight (8) TDI chemical containing storage tanks, P5, P6, P21, P22, R1, R2, C23, and MLD-1.

Response to comment 14(b):

The OAM will make the following corrections:

(17) TDI Storage tanks (QTY= ~~6~~ **8**), identified as P5, P6, P21, P22, R1, R2, C23, and MLD-1, FPR foam pouring lie (PLT1-4) foam pouring line (PLT1-4) -0.00105 lbs/hr or 0.0252 lbs/day or 0.0045 TPY of VOC

Comment 14(c):
Item (19) should show blending tanks C1-39 instead of TI-49, tanks C40-48 are process blending tanks that are closed systems with no emissions and therefore not regulated.

Response to comment 14(c):

(19) Blending operation with tanks (~~T1-49~~ C1-39 **and C40-48**) - 0.034 lbs/hr or 0.816 lbs/day or 0.15 TPY VOC

Existing Approvals

Comment 14(d):

No reference was made to a February 9, 1983 IDEM Registered Construction and Operation issuance for slab pour foam line EU-01. See Attachment D for a copy of the registration issuance for your files, and add to TSD.

Response to comment 14(d):

The OAM has included the a registration approval inadvertently left out.

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP 039-9044, March 4, 1998,
(2) CP 039-5335, withdrawn October 10, 1996,
(3) R 039-4850, issued on November 2, 1995,
(4) A 039-4622, issued on June 30, 1995,
(5) R 039-4383, issued on May 25, 1995,
(6) R 039-2347, issued on May 3, 1992,
(7) PC (20) 1832, issued on January 19, 1990, withdrawn on October 28, 1992
(8) Exemption, no permit number was provided, issued on February 6, 1989,
(9) Exemption, no permit number was provided, issued on December 5, 1986, **and**
(10) Registration, no permit number was provided, issued on February 9, 1983.

Total Potential Emissions (pg. 5 of 10)

Comment 14(e):

Due to the above referenced requested modifications, subsequent potential emissions calculations will have to be recalculated. In addition, the TSDs HAP PTE summary table on page 6 of 10 will need to remove Methyl Chloroform, since Carpenter manufacturing operations no longer emit that pollutant.

Response to comment 14(e):

The OAM has revised the following tables:

Permits	Date of issuance	PM	PM10	SO2	VOC	CO	NOx
039-9044	March 4, 1998	0.32	0.32	0.0	161	0.0	0.0
R39-4850	November 2, 1995 this registration	2.78	2.78	0.0	15.70	0.0	0.0
A 039-4622	June 30, 1995 Amendment to Registration 039-4383	14.27	11.34	0.0	2.76	0.0	0.0
R039-2347	March 3, 1992	0.0	0.0	0.0	1.8	0.0	11.4
Exemption	December 5, 1986						
Exemption	February 6, 1989						
CP 039-5335 withdrawn	Withdrawn on October 10, 1996	--	--	--	--	--	--
PC (20) 1832 withdrawn	Withdrawn on October 28, 1992	--	--	--	--	--	--
Total Potential emissions ton/yr		17.4	14.4	0.0	181.3	0.0	11.4
VOC for the original AOS will be subtracted out					- 46.12		
					135.18		
VOC for the new AOS will be add					~~+6.78~~ **2.15**		
Total		17.4	14.4	0.0	~~142.0~~ **137.4**	0.0	11.4

The OAM has deleted the Methyl Chloroform HAP since it is no longer being emitted.

HAP's	Potential Emissions (tons/year)
~~Methyl Chloroform~~	~~greater than 25~~
Methylene Chloride	greater than 25
All other HAPs	less than 10
TOTAL	greater than 25

Federal Rule Applicability

Comment 14(f):

Federal rule applicability will need to be revised due to the additional ASTs previously referenced, see Attachment C.

Response to comment 14(f)

The OAM has revised the following rules:

Federal Rule Applicability

Primary Pour Tanks EU-01

Tanks P1,P2,P3,P4,P5,P6,P7,P9,P10,P11,P12,P13,P14,P15,P16,P17,P18,P19,P20,P21,P22, P23,P24,P25,P26, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b), Subpart (Kb) since the storage capacity is more than 40m^3 but less than 75 m^3 and were constructed after July 23, 1984.

Tanks P8, and P26A are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tanks were constructed after July 23, 1984.

Chemical Blending - Tanks

Tanks C1,C2,C3,C4,C5,C6,C7,C8,C9,C10, C,11,C12,C13,C14,C15,C16,C17,C18, C19,C20,C21,C22,C23,C24,C25,C26,C27,C28,C29,C30,C31C,32,C33,C34,C35,C36,C37, and C38, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart (Kb)) since the storage capacity is more than 40m^3 but less than 75 m^3 and were constructed after July 23, 1984.

Tank C39 is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tank is storing nitrogen which not a volatile organic compound.

Rebond Tanks EU-4

Tanks R1 and R2 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tanks were constructed after July 23, 1984.

Mold Tanks EU-05

Tanks MLD 1, MLD 2, and MLD 3 are subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tanks were constructed after July 23, 1984.

~~Tanks 1,3,4,5,6,7,8,9,10,12,14,15,16,17,18,20,21,22,23,24,25,27,28,29,30,31,32,33,34,35,36 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.11.6b (a) and (b), Subpart (Kb)). All have a capacity of greater than 40 cubic meters, but less than 75 cubic meters.~~

~~Tanks 2, 11, 19, 26 and 37 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d). Because, the tanks have a design capacity greater than 19,813 gallons, but less than 39,890 gallons, the maximum true vapor pressures are less than 15 kPpa.~~

~~40 CFR Part 60, Subpart Kb, (Standards of Performance for Volatile Organic Liquid Storage~~

~~Vessels)~~

~~The volatile organic liquid storage tanks identified as MLD-1, MLD-2 and MLD-3 are not applicable to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb), because each tank has a volume of 31.20 cubic meters which is less than the applicability level of 40 cubic meters.~~

State Rule Applicability and Compliance Requirements (pgs 8, 9, and 10 of 10)

Comment 13(h):

State rule applicability and compliance requirements pgs. 8, 9, and 10 of 10, make incorrect references to facility coating booths in several locations of text. Carpenter does not operate coating booths in their surface coating operations as previously explained. Carpenter requests the references to booths be changed to represent either roll coating or HVLP application methods, for the respective emission units. In addition, PM emissions from EU-02 A roll coating application are non-existent, and EU-02B PM emissions are general ventilation. Carpenter requests the TSD compliance requirements be modified to reflect previously referenced Facility Operation Condition requests made in paragraph 9 and 10.

Response to comment 13(h):

The OAM will make the following changes to the TSD:

State Rule Applicability - Individual Facilities

326 IAC 8-2 (Surface Coating Emissions Limitations)

The material being coated with adhesive is polyurethane foam, which is a plastic. There are no specific limitations for coating plastics. Therefore, ~~coating booth~~ **roll coating unit** EU-02A is not subject to 326 IAC 8-2.

326 IAC 8-2 (General provisions relating to VOC rules: general reduction requirements for new facilities)

The maximum potential emissions for VOC are 15.7 tons per year. Therefore, **roll coating unit** ~~booth~~ EU-02A is not subject to 326 IAC 8-2.

326 IAC 8-2 (Surface Coating Emissions Limitations)

The material being coated with adhesive is polyurethane foam, which is a plastic. Therefore, are no specific limitations for coating plastics. Therefore, **adhesive stations** ~~coating booth~~ EU-02B and EU-02B:OAS No.2 are not subject to 326 IAC 8-2. The adhesive station EU-02:OAS No.1 is not subject this rule because acetone in not considered a VOC.

326 IAC 8-1(General provisions relating to VOC rules: general reduction requirements for new facilities)

The actual emissions for VOC are less than 15 tons per year. Therefore, **adhesive stations** ~~coating booth~~ EU-02B and EU-02B:OAS No.2 are not subject to 326 IAC 8-1-6 does not apply. The adhesive station EU-02B:OAS No.1 is not subject this rule because acetone in not considered a VOC.

The PM from the **following units**, ~~coating booth~~ EU-02A, EU-02B, EU-02B:OAS No.2, EU-5.1 and EU-5.2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Since the units identified as EU-02A and EU-02B are not required to be monitor because the actual emissions are less than 25 tons per year and no control is be utilized, the following shall be removed from the TSD:

~~Compliance Requirements~~

~~The compliance monitoring requirements applicable to this source are as follows:~~

~~1. The coating booth, identified as EU-02A, and coating booth, identified as EU-02B has applicable compliance monitoring conditions as specified below:~~

~~Compliance monitoring for adhesive stations identified as EU-02B:~~

~~D.2.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the adhesive station stack while one or more of the stations are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~(a) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~These monitoring conditions are necessary because ensures compliance with 326 IAC 6-3 (process Operations) and 326 IAC 2-7 (Part 70).~~

The following are comments from OAM staff:

Comment 1:

OAM will make the following changes to Section D.2.1 (now D.3.1) due to the description change:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM ~~from the coating booth~~ **for each adhesive station** shall not exceed the pound per hour emission rate established as E in the following formula:

Comment 2:

Section A.3(a), Section D.6 (now section D.8) and the TSD shall be revised as follows:

One (1) boiler, fueled by natural gas, rated at ~~thirteen~~ 8.36 MMBtu per hour, exhausting to a stack.

The Table of Contents has been updated to reflect the above mentioned changes.

Comment 3:

The following conditions D.2.2, D.3.2, D.6.2, D.7.2 and 10.2 (now condition D.9.2) shall be deleted.

D.2.2, D.3.2, D.6.2, D.7.2 and 10.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential VOC emissions from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Comment 4:
In order to show compliance with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) OAM is requiring that quarterly reporting be kept.
The natural gas certification form has been provided.

D.4.3 Natural Gas Certification
The natural gas boiler EU-3 certification form will document compliance with condition D.4.1 when the boiler EU-3 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C- General Reporting Requirements of this permit.

Response to comments received January 29, 1999.

Response to comment 1:

Emission unit one (EU-01 A and B) was inadvertently omitted from Section A. This has been corrected.

Response to comment 2:

OAM has reorganized the permit in sequential numerical order for ease of locating per Carpenter request.

Response to comment 3:

The alternative operating scenario number two (2), AOS-No.2, was incorrectly identified as EU-02. This has been changed to EU-02B.

Response to comment 4:

The stacks identified in Section A.2(d) (now identified as A.2(f)) as V-34 and V-35 have been combined into one (1) stack outlet identified as V-34. The correction has been made.

Response to comment 5:

The storage tanks, Primary pour, Rebond pour, Molding, and Chemical Blending, in Section A.2(h) (now identified as A.2(j)) have made description changes to following tanks P26A, C13, C19, C20, C21,C23,C24,C25,C26,C27,C28,C29,C30,C31,C33, R1, and R2. Please refer to response number 7 on page 8 for more details.

Response to comment 6:

The OAM will remove the specific number of bins form the facility descriptions because the bin quantity may vary.

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. grinding operation,
2. pneumatic conveyor system,
3. ~~six (6) bins,~~ **storage bins,**
4. foam dry mixer,
5. wet mixer,
6. molding unit, and
7. storage operations.

Response to comment 7:

The condition B.11 requires Annual Compliance Certification by July 1 of each year. This should be April 15 for Elkhart county. The change will be made.

Response to comment 8:

The Credible Evidence has been deleted from the table of contents.

Response to comment 9:

The condition C.17, Emission Statement, omits the day, 15th of April, that the report is due. The condition has been corrected.

Response to comment 10:

Condition C.20 (a) and the Quarterly Compliance Reporting form shall be deleted from the Title V since there are no compliance monitoring for this source.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.~~

~~(b)~~ **(a)** The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~(c)~~ **(b)** Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be

considered timely if received by IDEM, OAM, on or before the date it is due.

~~(d)~~ **(c)** Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

~~(e)~~ **(d)** All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

~~(f)~~ **(e)** Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(g)~~ **(f)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response to comment 11:

OAM will add the emission unit designations as follows: EU-01- slab stoke, EU-04 - rebond, and EU-05 - molded.

Response to comment 12:

The OAM has made the following change to the facility description since there is no applicator associated with this process.

The amount of VOC usage ~~delivered to the applicator of~~ **for** the foam pouring line identified as EU-01A/B shall be limited to less than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Response to comment 13:

According to Carpenter, Section D.9.3, VOC Emissions, does not allow time at the end of the month to complete the necessary documentation to show compliance. Carpenter has requested a statement to be added to allow for 30 days after the end of the month to demonstrate compliance to be consistent with the 30 days allowed to complete quarterly reports.

It is not necessary to indicate a specific amount of time to show documentation of compliance since condition D.9.5 (reporting requirements) (now D.1.5) references back to condition D.1.3 which states that within thirty days after the end of the quarter the compliance report is due.

Response to comment 14:

Section D.9.4(1) (now 1.4(1)) will be reworded since this process does not contain a coating process or use solvents for cleanup. The condition shall be reworded as follows:

(1) The amount and VOC content of each ~~coating~~ material ~~and solvent~~ used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents~~

Response to comment 15:

The OAM will delete number two(2).

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
~~(2) A log of the dates of use;~~
~~(3)~~ **(2)** The cleanup solvent usage for each month;
~~(4)~~ **(3)** The total VOC usage for each month; and
~~(5)~~ **(4)** The weight of VOCs emitted for each compliance period.

Response to comment 16:

The following facility description, located in the TSD Insignificant Activities list, shall be corrected as follows:

(17) TDI Storage tanks (QTY= 6) FPR foam pouring ~~lic~~ **line** (PLT1-4) ~~facm~~ **foam** pouring line (PLT1-4) -0.00105 lbs/hr or 0.0252 lbs/day or 0.0045 TPY of VOC

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit

Source Name:	**Carpenter Co.**
Source Location:	**195 County Road 15 South, Elkhart, IN 46515**
County:	**Elkhart**
SIC Code:	**3086, 2899, 3086**
Operation Permit No.:	**T039-6059-00086**
Permit Reviewer:	**Peggy Zukas**

On October 29, 1998, the Office of Air Management (OAM) had a notice published in the Elkhart Truth, in Elkhart, Indiana, stating that Carpenter Company had applied for a Part 70 Operating Permit to operate a polyurethane foam process, chemicals and chemical preparations, N.E.C. and rebonded foam manufacturing. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 22, 1998, Carpenter Company submitted comments on the proposed Part 70 permit. The summary of the comments is as follows:

Comment 1:

The foam pouring operation has not added any new ingredient categories since the original registration date of February 9, 1983. We have eliminated the use of Freon11 as a blowing agent in this operation per the Montreal Protocol. All other components are still in use. The main ingredient of concern, propylene oxide (PO), is an acid inhibitor added to urethane grade methylene chloride (MC) by the manufacturer of this chemical. It is our understanding that this inhibitor has been used in MC since the time the product was introduced into our industry as an auxiliary blowing agent (ABA). The PO concentration in MC is approximately 1.2- 1.5 weight percent per MSDS information. The PO will chemically react with any acid that might be formed in the MC thereby reducing the emissions of PO to less than 100% of the amount entering the process. Assuming 100% of the maximum amount of the PO in the MC is emitted, Carpenter calculates actual emissions of PO to be between six and eight tons per year. This calculation is simply the total MC usage for the year as determined by plant records multiplied by the percentage of PO in the raw material. Therefore, Carpenter Company requests a limit of less than 25 tons per year from Emission Unit 01 to avoid the requirements of BACT.

The space available to pour new foam into the slab room, Emission Unit 01B, is a limiting factor controlling the emission from the foam pour line, Emissions Unit 01A. A new pour of foam blocks is produced over approximately 5 hours of actual running time and placed in the slab room where they require an additional 12-14 hours of cure time due to the exothermic heat associated with the chemical reactions before further processing can occur. When the slab room has reached capacity, no additional slabs can be poured due to lack of storage space. The pour line is capable of producing more foam on a 24 hour basis than the slab room can store; but it is limited to the amount it can actually produce by the space available. This effectively limits production to 24 hour cycles. Operating cycles are as follows:

5 hours pouring + 14 hours curing + 5 hours moving stock = 24 hours
Calculations for maximum potential to emit (PTE) assume a maximum methylene chloride feed rate of 3600 lbs/hour and therefore a maximum feed rate of PO for 24 hours/day, 365 days/year. Assuming 100% of the PO is emitted, the PTE for this process would be 236.5 tons/yr per the following calculation:

8760 hrs/hr x 3600 lbs/hr MC x 0.015 (%PO)/2000 lbs/ton = 236.5 tons/yr PTE

Carpenter Company operates the foam pour line approximately 5 hours per day, 5 days per week, 50 weeks per year. Current production at 5 hrs/day, 5 days/wk, 50 wk/yr at the maximum feed rate again assuming 100% of the PO is emitted, gives emissions of 33.75 tons/yr. of PO per the following calculation:

5hr x 5 days x 50 weeks x 3600 lbs/hr MC x 0.015 (%PO)/2000 lbs/ton = 33.75 tons PO

Not all foams produced by Carpenter use MC as a ABA and those products that do use MC in their respective formulations do not all use MC at the maximum flow rate of 3600 lbs/hr. Firm foams use no MC while very soft foams use the maximum MC rate. The future usage rates of MC in foam have been addressed in the recently published NESHAP for our industry. Our actual usage in 1997 was 441 tons of MC. Again, assuming 100% of the PO in the MC was emitted results in 6.6 tons/ of PO emissions for 1997 per the following calculation:

441 tons MC x 0.015 (%PO in MC) = 6.6 tons PO in 1997

Response to comment 1:
OAM will put in a condition to limit the VOC content to less than 25 tons/yr in order to limit out of BACT.

~~D.9.1 (now identified as D.1.1) Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]~~

~~The amount of VOC usage delivered to the applicator of for the foam pouring line identified as EU-01A/B shall be limited to less than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.~~

The amount of methylene chloride (MC), with a maximum of 1.5 % of propylene oxide, shall be limited to less than 1600 tons per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the foam pouring line being greater than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

The following facility has been added to Section A and included in Section D. The OAM has reorganized the permit in sequential numerical order for ease of locating per Carpenter's request.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) foam pouring line, identified as EU-01A/B, consisting of a mixer, tunnel, foam block cut, and slab room, maximum production is 60,000 lbs of foam per hour exhausting through vents 14, 15, 16 and vent b through k.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Volatile Organic Compounds (VOCs) [326 IAC 8-1-6]

The amount of methylene chloride (MC), with a maximum of 1.5 % of propylene oxide, shall be limited
to less than 1600 tons per twelve (12) consecutive month period. This limitation will prevent the VOC emissions from the foam pouring line being greater than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

(b) Any change or modification which may increase the potential VOC emissions to 25 tons per year from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Compliance Determination Requirements

D.1.2 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing

D.1.3 VOC Emissions

Compliance with Condition D.1.1 shall be demonstrated within 30 days of the end of each month based on the total volatile organic compound usage for the most recent twelve (12) month period.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

No monitoring requirements are applicable to the foam pouring line.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.4 Record Keeping Requirements

(a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1.

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
(2) A log of the dates of use;
(3) The cleanup solvent usage for each month;
(4) The total VOC usage for each month; and
(5) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.3 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

The following page is a quarterly report form prepared by IDEM:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: **Carpenter Co.**
Source Address: **195 County Road 15 South, Elkhart, IN 46515**
Mailing Address: **P.O. Box 2386, Elkhart, IN Source Name:**
Part 70 Permit No.: **T039-6059-00086**
Facility: **Foam Pouring Line, identified as EU-01A/B**
Parameter: **Methylene Chloride usage**
Limit: **Less than or equal to 1600 tons per 12 month consecutive period**

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month Methylene Chloride usage	Previous 11 Months Methylene Chloride usage	12 Month Total
Month 1			
Month 2			
Month 3			

☐ **No deviation occurred in this quarter.**

☐ **Deviation/s occurred in this quarter.**
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

Comment 2:

The draft permit has omitted the emission unit one (EU-01A&B), the foam slab pour line and slab cure room as detailed in our May 1996 permit application. Please revise the draft to include this emission unit. Carpenter also requests they be allowed to review and comment, if necessary, on this revision/addition to the permit. These modifications will also need to be made within the respective Technical Support Document (TSD) emission unit descriptions.

Response to Comment 2:

Please refer to comment 1 for the changes.

Comment 3:

Emission unit two (EU-02A), needs to be changed to read One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32. Contrary to BCA's May2, 1997 letter, Carpenter has not begun an alternate operating scenario (AOS) with a HVLP gun. In addition Carpenter is now using a water based adhesive that should classify this facility as exempt. See Attachment A for revised facility emission spreadsheet calculations, PI-19 form, and flow diagram. These modifications will also need to be made within the respective TSD emission unit descriptions.

Response to Comment 3:

Section A.2, Section D.2 and the TSD shall be revised to reflect the following change:

(a) ~~One (1) coating booth, identified as EU-02A, coating plastic, type of application method is HVLP and exhausting to stack identified as V32.~~ **One (1) laminate line, identified as EU-02A, for water based adhesive lamination of plastic and urethane foam, type of application is roll coating, emissions vented to Stack V32.**

Comment 4:

Emission unit two (EU-02B), needs to be changed to read Three adhesive stations within three loop slitting process lines, identified as EU-02B, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions. The actual "operating scenario" applies Richadh 2414X adhesive and cleanup solvent, as it is written within Part 70 permit application. In addition, Carpenter requires that two additional alternative operating scenarios (AOS) be assigned to EU-02B. EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive, and thus have non-regulated emissions. EU-02B: AOS No. 2 will utilize UPACO 3694, an acetone and heptane based adhesive, that has already been issued registration permit CP-039-4850 in November 2, 1995. See attachment B for applicable AOS No. 1 and AOS No.2 facility flow diagrams, IDEM Registration issuance, and MSDS' for the above referenced modified EU-02 facility operating scenarios. These modifications will also need to be made within the respective TSD comments, and the emission unit descriptions in Section D.2.

Response to comment 4:

Section A.2(b), Section D.2 (now identified as D.3) and the TSD shall be revised because Carpenter has requested two additional alternative operating scenarios (AOS) be assigned to EU-02B. EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive, and thus have non-regulated emissions. EU-02B: AOS No. 2 will utilize UPACO 3694, an acetone and heptane based adhesive, that has already been issued registration permit CP-039-4850 in November 2, 1995. The following has been amended:

(b) ~~One (1) coating booth, identified as EU-02B, coating polyurethane foam, type of application method is HVLP.~~ **Three (3) adhesive stations with three (3) loop slitting process lines, identified as EU-02B, EU-02B:AOS-No.1 will include the use of UPACO Slabond 523 acetone based adhesive and EU-02B: AOS-No.2 will utilize UPACO 3694, an acetone and heptane based adhesive**, coating Polyurethane foam, type of application is HVLP, having general ventilation emissions.

Comment 5:

The description of the 12.55 MMBtu boiler (EU-03) includes the word “thirteen” for some unknown reason, we suspect it was a typographical error that should be removed. In addition, the error is repeated anywhere that boiler is referenced within the permit.

Response to comment 5:

Section A.2, Section D.3 (now identified as D.4) and the TSD shall be revised as follows:

One (1) boiler, identified as EU-03, fueled by natural gas, rated at ~~thirteen~~ 12.55 MMBtu per hour, exhausting to stack identified as V6.

Comment 6:

The draft permit has omitted the emission unit for (EU-04), the bonded foam line as detailed in our May 1996 permit application. Please revise the draft to include this emission unit. Carpenter also requests they be allowed to review and comment, if necessary, on this revision/addition to the permit. These modifications will also need to be made within the respective TSD emission unit descriptions.

Response to comment 6:

The OAM shall revise Section A.2 , and the TSD and add a new Section D.10 (now identified as D.5) to the permit.

(l) One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. **grinding operation,**
2. **pneumatic conveyor system,**
3. ~~**six (6) bins,**~~ **storage bins,**
4. **foam dry mixer,**
5. **wet mixer,**
6. **molding unit, and**
7. **storage operations.**

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. **grinding operation,**
2. **pneumatic conveyor system,**
3. ~~**six (6) bins,**~~ **storage bins,**
4. **foam dry mixer,**
5. **wet mixer,**
6. **molding unit, and**
7. **storage operations.**

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM for the bonded foam line shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$$E = 4.10\ P^{0.67}$$

where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Compliance Determination Requirements

D.5.2 Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the PM limit specified in Condition D.5.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

The following calculations were taken from the registration CP 039-2347-00086:

(1) VOC from molding process: 0.35 lb/hr
Emissions: 0.35 lb/hr x 24 hr/day = 8.4 lb/day

8.4 lb/day x 365 day/yr/ 2000lbs/ton = 1.5 ton/yr

(2) PM from grinding operation- escapes from a pneumatic collection system into factory space, everything else is product.

Emissions = 1.0 lb/hr = 24 lb/day = 4.4 tons/yr.

Comment 7:

The following modifications need to be made for the bulk chemical above ground storage tank (AST) facilities to accurately detail the present facility/operating conditions. These modifications should be made in A.2 (h) and the Technical Support Document (TSD) emission unit description (h) Carpenter's ASTs can be grouped into four general categories and will have the following revised identification numbering system:

A. Primary pour, P1 through P26A,
B. Rebond pour, R1 and R2,
C. Molding, MLD1 through MLD3, and
D. Chemical Blending, C1 through C39

Carpenter ASTs are shelters inside the production building. Therefore the ASTs and the raw material are not subject to the diurnal temperature fluctuations normally encountered when ASTs are exposed to outside elements. This protection from the elements allows raw materials to maintain relatively uniform temperatures, therefore emissions from the respective chemicals are effectively constant. Most stored products have low vapor pressure and should result in little or no breathing losses. In addition for those products which have vapor pressure that indicate losses, Carpenter utilizes a variety of emission controls on HAP containing ASTs that include closed systems (CS), conservation vents (CV), nitrogen Blankets (N2), and stack/vent carbon absorption bed filters (CA). See Attachment C AST Summary Table for specific AST emission calculation parameters, that reflect the permits source summary.

Response to comment 7:

In Section A.2(h) and D. 5 (now identified as D.7) the OAM will revise the tanks information as follows:

The rule 326 IAC 12, (40 CFR 60.116b(d), Subpart (Kb)) has been deleted in section D.5.2 (now D.7.2) because the vapor pressure of the applicable tanks (C2, C11, C19, C25 and C37) is zero (0).

(h) The following tanks are ~~part of the chemical blending and packaging process:~~ **grouped into four general categories - Primary pour, Rebond pour, Molding, and Chemical Blending:**

Primary Pour tanks EU-01

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
P1	12,500	10.5	19.5	3000	POLYOL	0	600,000
P2	12,500	10.5	19.5	3000	POLYOL	0	600,000
P3	12,500	10.5	19.5	3500	POLYOL	0	115,000
P4	12,500	10.5	19.5	3500	POLYOL	0	115,000
P5* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P6* CA	12,500	10.5	19.5	174	ISO	0.01	410,000
P7* CV	12,500	10.5	19.5	85	ABA	352	100,000
P8	4,890	8	15	NA	empty	NA	0
P9	12,500	10.5	19.5	3000	POLYOL	0	130,000
P10	12,500	10.5	19.5	5000	POLYOL	0	115,000
P11	12,500	10.5	19.5	6500	POLYOL	0	150,000
P12	12,500	10.5	19.5	6500	POLYOL	0	150,000
P13	11,500	10.5	18	410	FR	NA	150,000
P14	12,000	10.5	18	NA	EMPTY	NA	0
P15	12,000	10.5	18	NA	EMPTY	NA	0
P16	12,000	10.5	18	NA	EMPTY	NA	0
P17	12,000	10.5	18	5000	POLYOL	0	115,000
P18	12,000	10.5	18	3000	POLYOL	0	130,000
P19	12,000	10.5	18	NA	EMPTY	na	0
P20	12,000	10.5	18	NA	EMPTY	na	0
P21* CA	12,000	10.5	18	174	ISO	0	410,000
P22* CA	12,000	10.5	18	174	ISO	0	410,000
P23	12,000	10.5	18	3500	POLYOL	0	115,000
P24	12,000	10.5	18	3500	POLYOL	0	115,000
P25	12,000	10.5	18	3000	POLYOL	0	600,000
P26	12,000	10.5	18	3000	POLYOL	0	600,000
P26A	3,000	~~8~~	~~18~~ 8	3500	POLYOL	0	100,000

Notes: * Emission control device: conservation vents (CV), Nitrogen Blanket (N2), or Carbon Absorption bed filters (CA)
**** Closed system**

Chemical Blending - Tanks

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
C1	11,500	8	30.5	5000	POLYOL	0	20,000
C2	28,500	12	34	6500	POLYOL	0	250,000
C3	11,500	8	30.5	285	FR	0.2	20,000
C4	11,500	8	30.5	575	EMPTY	NA	0
C5	11,500	8	30.5	575	POLYOL	0	5,000
C6	11,500	8	30.5	575	POLYOL	0	10,000
C7	11,500	8	30.5	575	POLYOL	0	10,000
C8	11,500	8	30.5	700	POLYOL	0	10,000
C9	11,500	8	30.5	5000	POLYOL	0	10,000
C10	11,500	8	30.5	575	POLYOL	0	5,000
C11	28,500	12	34	360	POLYOL	0	150,000
C12	11,500	8	30.5	575	POLYOL	0	5,000
C13**	11,500	8	30.5	116.8	ABA	~~20.36~~ 132.9	50,000
C14	11,500	8	30.5	5000	POLYOL	0	50,000
C15	11,500	8	30.5	5000	POLYOL	0	5,000
C16	11,500	8	30.5	575	POLYOL	0	tanks combined C16 +C17 +
C17	11,500	8	30.5	575	POLYOL	0	C18
C18	11,500	8	30.5	575	POLYOL	0	100,000
C19	28,500	12	34	360	MDI	0	~~100,000~~ 150,000
C20	11,500	8	30.5	NA	EMPTY	NA	~~150,000~~ Future polyol
C21	11,500	8	30.5	360	MDI	0	~~Future polyol~~ 20,000
C22	11,500	8	30.5	360	MDI	0	20,000
C23 externally vented	11,500	8	30.5	174	ISO	0.01	~~20,000~~ 30,000
C24	11,500	8	30.5	NA	EMPTY	NA	~~30,000~~ Future Polyol
C25 externally vented	28,500	12	34	500	EXTENDER	0.1	~~Future POLYOL~~ 600,000
C26	11,500	8	30.5	5000	POLYOL	0	~~600,000~~ 25,000
C27	11,500	8	30.5	NA	EMPTY	NA	~~25,000~~ Future polyol
C28	11,500	8	30.5	360	MDI	0	~~Future POLYOL~~ 30,000
C29	11,500	8	30.5	538	BPOLYOL	0	~~30,000~~ 10,000
C30	11,500	8	30.5	538	BPOLYOL	0	~~10,000~~ 50,000
C31	11,500	8	30.5	538	BPOLYOL	0	~~50,000~~ 10,000
C32	11,500	8	30.5	538	BPOLYOL	0	10,000
C33	11,500	8	30.5	174	A-PP	0	~~10,000~~ 500,000
C34	11,500	8	30.5	2000	BPOLYOL	0	500,000
C35	11,500	8	30.5	538	BPOLYOL	0	Future POLYOL
C36	11,500	8	30.5	538	BPOLYOL	0	Future POLYOL

C37	**28,500**	**12**	**34**	**360**	**MDI**	**0**	**150,000**
C38**	**12,000**	**9**	**41**	**120.8**	**ABA**	**0**	**10,000**

Notes: * Emission control device: conservation vent (CV), Nitrogen blanket (N2), or carbon absorption bed filters (CA)
**** Closed system**

Rebond tanks EU-4

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
R1	**6,500**	**8**	**17.3**	**174**	**ISO-PP**	**0.01**	~~**250,000**~~ **500,000**
R2	**4,000**	**8**	**10**	**174**	**ISO-PP**	**0.01**	~~**250,000**~~ **500,000**

Notes: * Emission control device, CV, N2, or CA
**** Closed System**
ISO-PP - Isocyanate Prepolymer
***** R1 and R2 cascade from one tank to the next for a TOTAL annual throughput of 500,000 gallons. These tanks are vented through only one (1) vent.**

Mold Tanks EU-05

Fixed Roof Cone Storage Tanks	Storage Capacity (gallons)	Diameter (feet)	Height (feet)	Vapor MW	Containing	VP (mmHg)	Annual Throughput gallons
MLD 1	**8,200**	**10**	**14**	**195**	**B POLY**	**0.01**	**131,549**
MLD2	**8,200**	**10**	**14**	**5000**	**BPOLY**	**0**	**323,546**
MLD3	**8,200**	**10**	**14**	**5000**	**ISO**	**0**	**310,408**

Notes: * Emission control device, CV, N2, or CA
**** Closed System**

~~Emission Limitations and Standards [326 IAC 2-7-5(1)]~~

~~D.5.1 Permit Requirements~~

~~Any change or modification which may increase the potential VOC emissions to 25 tons more from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.~~

Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.5.2 (now 7.1) Record keeping Requirement

Pursuant to 60.116b (a) and (b) the owner or operator of each storage vessel shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the vessel for the life of the source. ~~Pursuant to 60.116b (d), for tanks numbered 2, 11, 19, 26 and 37, the owner or operator of each storage vessel storing a liquid with a maximum true vapor pressure that is normally less than 27.6 kPa shall notify the Administrator within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure value~~

The following has been deleted from A.2(h) and Section D.5 (now D.7)facility operation conditions:

~~Facility Description [326 IAC 2-7-5(15)] Fixed roof cone storage tanks with nitrogen blankets~~	~~Storage Capacity (gallons)~~	~~Diameter (feet)~~	~~Height (feet)~~	~~Containing~~	~~Annual throughput (gallons)~~
~~1, 4, 5, 6, 7, 8, 9, 10, 12, 14, 15, 16, 17, 18, 20, 23, 24, 25, and 27~~	~~11,500~~	~~8~~	~~30.5~~	~~polyols~~	~~11,900~~
~~2~~	~~28,500~~	~~12~~	~~34~~	~~polyols~~	~~20,300~~
~~3~~	~~11,500~~	~~8~~	~~30.5~~	~~fyrol CEF~~	~~20,292~~
~~11, 26~~	~~28,500~~	~~12~~	~~34~~	~~polyols~~	~~11,900~~
~~19~~	~~28,500~~	~~12~~	~~34~~	~~MDI based isocyanates~~	~~72,500~~
~~21~~	~~11,500~~	~~8~~	~~30.5~~	~~polyols~~	~~72,500~~
~~22, 28~~	~~11,500~~	~~8~~	~~30.5~~	~~MDI based isocyanates~~	~~72,500~~
~~29, 30, 31, 32, 33, 34, 35, 36~~	~~11,500~~	~~8~~	~~30.5~~	~~Richfill 101-4125 or related derivative~~	~~21,900~~
~~37~~	~~28,500~~	~~12~~	~~34~~	~~Richfill 101-5084 or related derivative~~	~~21,900~~

Comment 8:

B.27, Credible Evidence, states impart that “other credible evidence may be used to demonstrate compliance or non compliance.” In other conditions, the permit states specific methods that may be used to determine compliance or noncompliance with applicable requirements of the permit. To allow for use of “other credible evidence” is vague and subject to interpretation as to meaning. IDEM’s authority to include such a vague provision in a part 70 permit is in question. Carpenter does not believe this condition should be made a binding part of a Part 70 permit. Carpenter requests that this condition be removed in its entirety.

Response to comment 8:

The IDEM now believes that this condition is not necessary and has removed it from the permit. The issues regarding credible evidence can be adequately addressed during a showing of compliance or noncompliance. Indiana’s statutes, and the rules adopted under their authority, govern the admissibility of evidence in any proceeding. Indiana law contains no provisions that limit the use of any credible evidence and an explicit statement is not required in the permit.

~~B.27 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]~~

~~Not withstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or non compliance.~~

Comment 9:

C.17(b), Emission Statement, states in part that "the annual emission statement covers the 12 consecutive month time period starting December 1 and ending November 30". Carpenter usage records and inventory process are generated from the normal calender time period of January 1 and ending December 31. Creating a new inventory methodology just for chemical usage would be burdensome. Carpenter therefore, requests their emission statement cover a normal calender time period. In addition, a submittal mailing address was omitted from the draft permit.

Response to comment 9:

The OAM will make the following change to C.17 by adding the mailing address:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

Since Carpenter is subject to 326 IAC 2-6-1(a) and 326 IAC 2-6-2(13)(A), the annual emission statement shall cover the twelve (12) consecutive month time period starting December 1 and ending November 30. The condition shall remain the same.

Comment 10:

D.1.1 Particulate Matter, does not apply for EU-02A since the operation is rollcoating and does not emit PM. Likewise, D.1.3 and D.1.4 do not apply. Carpenter requests removal of Condition D.1.1, D.1.3 and D.1.4 from draft permit.

Response to comment 10:

Conditions D.1.1, D.1.3 and D.1.4 (now D.2.1, D.2.2 and D.2.4) shall be removed. Since the lamination process is not using HVLP but instead roll coating, the following condition shall be deleted or modified:

~~D.1.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]~~

~~The PM from the coating booth shall not exceed the pound per hour emission rate established as E in the following formula:~~

~~Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:~~

~~$E = 4.10 P^{0.67}$ where E = rate of emission in pounds per hour; and~~
~~P = process weight rate in tons per hour~~

~~D.1.2 Volatile Organic Compounds (VOC)~~

~~Any change or modification which may increase the potential VOC emissions to 25 tons per year from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.~~

Compliance Determination Requirements

D.1.3 (now 2.1) Testing Requirements [326 IAC 2-7-6(1)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance.

If testing is required by IDEM, compliance ~~with the PM limit specified in Condition D.1.1~~ shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.1.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the surface coating booth stackV32 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Comment 11:

D.2.3, Testing Requirements, and D.2.4, Monitoring, do not apply to EU-02B since this facility's operation does not utilize a surface coating booth or stack. PM emissions go to general ventilation, without a control device. Carpenter requests removal of Conditions D.2.3 and D.2.4 from the permit.

Response to comment 11:
(D.2.3 is now identified as D.3.2)

The OAM is aware that the process does not require testing requirements. This is evident in the first sentence of the condition which states, "The Permittee is not required to test this facility by this permit." Since OAM is not requiring a stack test and the condition states this fact, the condition shall remain the same.

The monitoring condition shall be removed since the unit does not have a control device and the actual emissions do not exceed 25 tons per year.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

~~D.2.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the adhesive station stack while one or more of the stations are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

Comment 12:

D.4.2 (b) BACT condition, states in part that the weight % solids of the mold release " . . . Shall be no more than 7%...". It should read, **. . . shall be not less than 7% . . . .**

Response to comment 12:
(D.4.2 is now identified D.6.2)

The following condition shall be revised as follows:

(b) The weight percentage solid content and maximum usage of mold release at the two (2) closed polyurethane turnstile production units identified as EU-5.1 and EU-5.2 with a combined maximum capacity of 400 unit per hour shall be no ~~more~~ **less** than 7% and **no more than** 0.003 gallons per unit. This ~~is~~ **shall be** equivalent **or less than** 32.50 tons per 12 month period from each turnstile production unit identified as EU-5.1 and EU-5.2.

Comment 13:

D.4.4 Record Keeping Requirement, references "compliance with Operation Condition 5.2 (b)". Although the number system will change due to additions, it should have referenced Operation Condition 4.2 (b). In addition several misspelled words were discovered in this section, which need to be corrected.

Response to comment 13:

Condition D.4.4 (now D.6.4) will be revised as follows:

D.4.4 (now D.6.4) Record Keeping Requirement

A log of information necessary to document compliance with operation permit condition No.~~5~~ **6**.2 (b) shall be maintained. These records shall be kept for at least the past 36 months period and made available upon request to the Office of Air Management (OAM).

The following will show corrections concerning the TSD but no changes will be made in the TSD.

Comment 14:

Due to the above referenced requested modifications, subsequent TSD information will also require modifications to reflect the new permit conditions. In addition, the following modifications need to be made to reflect current site/source conditions.

Insignificant Activities

Comment 14(a):

(4) Refractory storage and (20) Flame lamination should be removed since they are no longer used.

Response to comment 14(a):

The following equipment have been removed from the company.

~~(4) Refractory storage not requiring air pollution control equipment.~~
~~(20) Flame laminators - 1.02 lbs/hr or 24.48 lbs/day or 4.47 TPY PM~~

Comment 14 (b):

Item (17) should show eight (8) TDI chemical containing storage tanks, P5, P6, P21, P22, R1, R2, C23, and MLD-1.

Response to comment 14(b):

The OAM will make the following corrections:

(17) TDI Storage tanks (QTY= ~~6~~ **8**), identified as P5, P6, P21, P22, R1, R2, C23, and MLD-1, FPR foam pouring lie (PLT1-4) foam pouring line (PLT1-4) -0.00105 lbs/hr or 0.0252 lbs/day or 0.0045 TPY of VOC

Comment 14(c):
Item (19) should show blending tanks C1-39 instead of TI-49, tanks C40-48 are process blending tanks that are closed systems with no emissions and therefore not regulated.

Response to comment 14(c):

(19) Blending operation with tanks (~~T1-49~~ C1-39 **and C40-48**) - 0.034 lbs/hr or 0.816 lbs/day or 0.15 TPY VOC

Existing Approvals

Comment 14(d):

No reference was made to a February 9, 1983 IDEM Registered Construction and Operation issuance for slab pour foam line EU-01. See Attachment D for a copy of the registration issuance for your files, and add to TSD.

Response to comment 14(d):

The OAM has included the a registration approval inadvertently left out.

The source has been operating under previous approvals including, but not limited to, the following:

(1) CP 039-9044, March 4, 1998,
(2) CP 039-5335, withdrawn October 10, 1996,
(3) R 039-4850, issued on November 2, 1995,
(4) A 039-4622, issued on June 30, 1995,
(5) R 039-4383, issued on May 25, 1995,
(6) R 039-2347, issued on May 3, 1992,
(7) PC (20) 1832, issued on January 19, 1990, withdrawn on October 28, 1992
(8) Exemption, no permit number was provided, issued on February 6, 1989,
(9) Exemption, no permit number was provided, issued on December 5, 1986, **and**
(10) Registration, no permit number was provided, issued on February 9, 1983.

Total Potential Emissions (pg. 5 of 10)

Comment 14(e):

Due to the above referenced requested modifications, subsequent potential emissions calculations will have to be recalculated. In addition, the TSDs HAP PTE summary table on page 6 of 10 will need to remove Methyl Chloroform, since Carpenter manufacturing operations no longer emit that pollutant.

Response to comment 14(e):

The OAM has revised the following tables:

Permits	Date of issuance	PM	PM10	SO2	VOC	CO	NOx
039-9044	March 4, 1998	0.32	0.32	0.0	161	0.0	0.0
R39-4850	November 2, 1995 this registration	2.78	2.78	0.0	15.70	0.0	0.0
A 039-4622	June 30, 1995 Amendment to Registration 039-4383	14.27	11.34	0.0	2.76	0.0	0.0
R039-2347	March 3, 1992	0.0	0.0	0.0	1.8	0.0	11.4
Exemption	December 5, 1986						
Exemption	February 6, 1989						
CP 039-5335 withdrawn	Withdrawn on October 10, 1996	--	--	--	--	--	--
PC (20) 1832 withdrawn	Withdrawn on October 28, 1992	--	--	--	--	--	--
Total Potential emissions ton/yr		17.4	14.4	0.0	181.3	0.0	11.4
VOC for the original AOS will be subtracted out					- 46.12		
					135.18		
VOC for the new AOS will be add					~~+6.78~~ **2.15**		
Total		17.4	14.4	0.0	~~142.0~~ **137.4**	0.0	11.4

The OAM has deleted the Methyl Chloroform HAP since it is no longer being emitted.

HAP's	Potential Emissions (tons/year)
~~Methyl Chloroform~~	~~greater than 25~~
Methylene Chloride	greater than 25
All other HAPs	less than 10
TOTAL	greater than 25

Federal Rule Applicability

Comment 14(f):

Federal rule applicability will need to be revised due to the additional ASTs previously referenced, see Attachment C.

Response to comment 14(f)

The OAM has revised the following rules:

Federal Rule Applicability

Primary Pour Tanks EU-01

Tanks P1,P2,P3,P4,P5,P6,P7,P9,P10,P11,P12,P13,P14,P15,P16,P17,P18,P19,P20,P21,P22, P23,P24,P25,P26, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b), Subpart (Kb) since the storage capacity is more than 40m^3 but less than 75 m^3 and were constructed after July 23, 1984.

Tanks P8, and P26A are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tanks were constructed after July 23, 1984.

Chemical Blending - Tanks

Tanks C1,C2,C3,C4,C5,C6,C7,C8,C9,C10, C,11,C12,C13,C14,C15,C16,C17,C18, C19,C20,C21,C22,C23,C24,C25,C26,C27,C28,C29,C30,C31C,32,C33,C34,C35,C36,C37, and C38, are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116b, Subpart (Kb)) since the storage capacity is more than 40m^3 but less than 75 m^3 and were constructed after July 23, 1984.

Tank C39 is not subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tank is storing nitrogen which not a volatile organic compound.

Rebond Tanks EU-4

Tanks R1 and R2 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tanks were constructed after July 23, 1984.

Mold Tanks EU-05

Tanks MLD 1, MLD 2, and MLD 3 are subject to New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d)) since the tanks were constructed after July 23, 1984.

~~Tanks 1,3,4,5,6,7,8,9,10,12,14,15,16,17,18,20,21,22,23,24,25,27,28,29,30,31,32,33,34,35,36 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.11.6b (a) and (b), Subpart (Kb)). All have a capacity of greater than 40 cubic meters, but less than 75 cubic meters.~~

~~Tanks 2, 11, 19, 26 and 37 are subject to the New Source Performance Standard, 326 IAC 12, (40 CFR 60.116(d). Because, the tanks have a design capacity greater than 19,813 gallons, but less than 39,890 gallons, the maximum true vapor pressures are less than 15 kPpa.~~

~~40 CFR Part 60, Subpart Kb, (Standards of Performance for Volatile Organic Liquid Storage~~

~~Vessels)~~

~~The volatile organic liquid storage tanks identified as MLD-1, MLD-2 and MLD-3 are not applicable to the New Source Performance Standard, 326 IAC 12, (40 CFR Part 60.110, Subpart Kb), because each tank has a volume of 31.20 cubic meters which is less than the applicability level of 40 cubic meters.~~

State Rule Applicability and Compliance Requirements (pgs 8, 9, and 10 of 10)

Comment 13(h):

State rule applicability and compliance requirements pgs. 8, 9, and 10 of 10, make incorrect references to facility coating booths in several locations of text. Carpenter does not operate coating booths in their surface coating operations as previously explained. Carpenter requests the references to booths be changed to represent either roll coating or HVLP application methods, for the respective emission units. In addition, PM emissions from EU-02 A roll coating application are non-existent, and EU-02B PM emissions are general ventilation. Carpenter requests the TSD compliance requirements be modified to reflect previously referenced Facility Operation Condition requests made in paragraph 9 and 10.

Response to comment 13(h):

The OAM will make the following changes to the TSD:

State Rule Applicability - Individual Facilities

326 IAC 8-2 (Surface Coating Emissions Limitations)

The material being coated with adhesive is polyurethane foam, which is a plastic. There are no specific limitations for coating plastics. Therefore, ~~coating booth~~ **roll coating unit** EU-02A is not subject to 326 IAC 8-2.

326 IAC 8-2 (General provisions relating to VOC rules: general reduction requirements for new facilities)

The maximum potential emissions for VOC are 15.7 tons per year. Therefore, **roll coating unit** ~~booth~~ EU-02A is not subject to 326 IAC 8-2.

326 IAC 8-2 (Surface Coating Emissions Limitations)

The material being coated with adhesive is polyurethane foam, which is a plastic. Therefore, are no specific limitations for coating plastics. Therefore, **adhesive stations** ~~coating booth~~ EU-02B and EU-02B:OAS No.2 are not subject to 326 IAC 8-2. The adhesive station EU-02:OAS No.1 is not subject this rule because acetone in not considered a VOC.

326 IAC 8-1(General provisions relating to VOC rules: general reduction requirements for new facilities)

The actual emissions for VOC are less than 15 tons per year. Therefore, **adhesive stations** ~~coating booth~~ EU-02B and EU-02B:OAS No.2 are not subject to 326 IAC 8-1-6 does not apply. The adhesive station EU-02B:OAS No.1 is not subject this rule because acetone in not considered a VOC.

The PM from the **following units**, ~~coating booth~~ EU-02A, EU-02B, EU-02B:OAS No.2, EU-5.1 and EU-5.2, shall not exceed the pound per hour emission rate established as E in the following formula:

Interpolation and extrapolation of the data for the process weight rate up to sixty thousand (60,000) pounds per hour shall be accomplished by use of the equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

Since the units identified as EU-02A and EU-02B are not required to be monitor because the actual emissions are less than 25 tons per year and no control is be utilized, the following shall be removed from the TSD:

~~Compliance Requirements~~

~~The compliance monitoring requirements applicable to this source are as follows:~~

~~1. The coating booth, identified as EU-02A, and coating booth, identified as EU-02B has applicable compliance monitoring conditions as specified below:~~

~~Compliance monitoring for adhesive stations identified as EU-02B:~~

~~D.2.4 Monitoring~~

~~(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, daily observations shall be made of the overspray from the adhesive station stack while one or more of the stations are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~(b) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.~~

~~(a) Weekly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an overspray emission, evidence of overspray emission, or other abnormal emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.~~

~~These monitoring conditions are necessary because ensures compliance with 326 IAC 6-3 (process Operations) and 326 IAC 2-7 (Part 70).~~

The following are comments from OAM staff:

Comment 1:

OAM will make the following changes to Section D.2.1 (now D.3.1) due to the description change:

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.1 Particulate Matter (PM) [326 IAC 6-3-2(c)]

The PM ~~from the coating booth~~ **for each adhesive station** shall not exceed the pound per hour emission rate established as E in the following formula:

Comment 2:

Section A.3(a), Section D.6 (now section D.8) and the TSD shall be revised as follows:

One (1) boiler, fueled by natural gas, rated at ~~thirteen~~ 8.36 MMBtu per hour, exhausting to a stack.

The Table of Contents has been updated to reflect the above mentioned changes.

Comment 3:

The following conditions D.2.2, D.3.2, D.6.2, D.7.2 and 10.2 (now condition D.9.2) shall be deleted.

D.2.2, D.3.2, D.6.2, D.7.2 and 10.2 Volatile Organic Compounds (VOC)

Any change or modification which may increase the potential VOC emissions from the processes noted above, must be approved by the Office of Air Management (OAM) before such change may occur.

Comment 4:
In order to show compliance with 326 IAC 5-1 (Opacity Limitations) and 326 IAC 6-2-4 (Particulate Matter Emission Limitations for Sources of Indirect Heating) OAM is requiring that quarterly reporting be kept.
The natural gas certification form has been provided.

D.4.3 Natural Gas Certification
The natural gas boiler EU-3 certification form will document compliance with condition D.4.1 when the boiler EU-3 is burning natural gas. The certification form shall be submitted quarterly to the address listed in Section C- General Reporting Requirements of this permit.

Response to comments received January 29, 1999.

Response to comment 1:

Emission unit one (EU-01 A and B) was inadvertently omitted from Section A. This has been corrected.

Response to comment 2:

OAM has reorganized the permit in sequential numerical order for ease of locating per Carpenter request.

Response to comment 3:

The alternative operating scenario number two (2), AOS-No.2, was incorrectly identified as EU-02. This has been changed to EU-02B.

Response to comment 4:

The stacks identified in Section A.2(d) (now identified as A.2(f)) as V-34 and V-35 have been combined into one (1) stack outlet identified as V-34. The correction has been made.

Response to comment 5:

The storage tanks, Primary pour, Rebond pour, Molding, and Chemical Blending, in Section A.2(h) (now identified as A.2(j)) have made description changes to following tanks P26A, C13, C19, C20, C21,C23,C24,C25,C26,C27,C28,C29,C30,C31,C33, R1, and R2. Please refer to response number 7 on page 8 for more details.

Response to comment 6:

The OAM will remove the specific number of bins form the facility descriptions because the bin quantity may vary.

One (1) bonded foam line, identified as EU-04, consisting of the following equipment:

1. grinding operation,
2. pneumatic conveyor system,
3. ~~six (6) bins,~~ **storage bins,**
4. foam dry mixer,
5. wet mixer,
6. molding unit, and
7. storage operations.

Response to comment 7:

The condition B.11 requires Annual Compliance Certification by July 1 of each year. This should be April 15 for Elkhart county. The change will be made.

Response to comment 8:

The Credible Evidence has been deleted from the table of contents.

Response to comment 9:

The condition C.17, Emission Statement, omits the day, 15th of April, that the report is due. The condition has been corrected.

Response to comment 10:

Condition C.20 (a) and the Quarterly Compliance Reporting form shall be deleted from the Title V since there are no compliance monitoring for this source.

C.20 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

~~(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.~~

~~(b)~~ **(a)** The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:
Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

~~(c)~~ **(b)** Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be

considered timely if received by IDEM, OAM, on or before the date it is due.

~~(d)~~ **(c)** Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

~~(e)~~ **(d)** All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

~~(f)~~ **(e)** Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

~~(g)~~ **(f)** The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Response to comment 11:

OAM will add the emission unit designations as follows: EU-01- slab stoke, EU-04 - rebond, and EU-05 - molded.

Response to comment 12:

The OAM has made the following change to the facility description since there is no applicator associated with this process.

The amount of VOC usage ~~delivered to the applicator of~~ **for** the foam pouring line identified as EU-01A/B shall be limited to less than 25 tons per year. Therefore, the best available control technology (BACT) requirement in 326 IAC 8-1-6 (New Facilities: General Reduction Requirements) does not apply.

Response to comment 13:

According to Carpenter, Section D.9.3, VOC Emissions, does not allow time at the end of the month to complete the necessary documentation to show compliance. Carpenter has requested a statement to be added to allow for 30 days after the end of the month to demonstrate compliance to be consistent with the 30 days allowed to complete quarterly reports.

It is not necessary to indicate a specific amount of time to show documentation of compliance since condition D.9.5 (reporting requirements) (now D.1.5) references back to condition D.1.3 which states that within thirty days after the end of the quarter the compliance report is due.

Response to comment 14:

Section D.9.4(1) (now 1.4(1)) will be reworded since this process does not contain a coating process or use solvents for cleanup. The condition shall be reworded as follows:

(1) The amount and VOC content of each ~~coating~~ material ~~and solvent~~ used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. ~~Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents~~

Response to comment 15:

The OAM will delete number two(2).

(1) The amount and VOC content of each material used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.
~~(2) A log of the dates of use;~~
~~(3)~~ **(2)** The cleanup solvent usage for each month;
~~(4)~~ **(3)** The total VOC usage for each month; and
~~(5)~~ **(4)** The weight of VOCs emitted for each compliance period.

Response to comment 16:

The following facility description, located in the TSD Insignificant Activities list, shall be corrected as follows:

(17) TDI Storage tanks (QTY= 6) FPR foam pouring ~~lic~~ **line** (PLT1-4) ~~facm~~ **foam** pouring line (PLT1-4) -0.00105 lbs/hr or 0.0252 lbs/day or 0.0045 TPY of VOC